

City of Lowell Massachusetts

CONSOLIDATED PLAN For ESG, CDBG, HOME, HOPWA Programs

For the Five-Year Period
July 1, 2010 – June 30, 2015

FINAL REPORT

Office of the City Manager
Division of Planning and Development
JFK Civic Center, 50 Arcand Drive
Lowell, MA 01852
978-446-7200

May, 2010



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Jurisdiction

Massachusetts ▼

Consolidated Plan

Strategic Plan for Years

2010 ▼

to

2015 ▼

?

Annual Action Plan and

Consolidated Annual Performance and Evaluation Report

Presented to the U.S. Department of Housing and Urban Development

Boston ▼

Field Office of Community Planning and Development

Strategic Plan Submission Date

5/15/2010

Amendments:

	▼	MM/DD/YY	Name:	
	▼	MM/DD/YY	Name:	
	▼	MM/DD/YY	Name:	
	▼	MM/DD/YY	Name:	
	▼	MM/DD/YY	Name:	

* If Necessary

Jurisdiction		UOG: MA251284 LOWELL		▼
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Massachusetts	1852	Country U.S.A.	Division of Planning and Development	
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<p>"To the best of my knowledge and belief, all data in this application are true and correct, the document has been duly authorized by the governing body of the applicant, and the applicant will comply with the attached assurances if the assistance is awarded." Please update the date with each new Action Plan and CAPER submission.</p>				
Name:		Date:		
Title:		(MM/DD/YY)		



3-5 Year Strategic Plan

This document includes Narrative Responses to specific questions that grantees of the Community Development Block Grant, HOME Investment Partnership, Housing Opportunities for People with AIDS and Emergency Shelter Grants Programs must respond to in order to be compliant with the Consolidated Planning Regulations.

GENERAL	2
Executive Summary	2
Strategic Plan	11
General Questions	13
Managing the Process (91.200 (b))	19
Citizen Participation (91.200 (b))	31
Institutional Structure (91.215 (i))	42
Monitoring (91.230)	47
Priority Needs Analysis and Strategies (91.215 (a))	49
Lead-based Paint (91.215 (g))	50
HOUSING	53
Housing Needs (91.205)	53
Priority Housing Needs (91.215 (b))	62
Housing Market Analysis (91.210)	67
Specific Housing Objectives (91.215 (b))	79
Needs of Public Housing (91.210 (b))	81
Public Housing Strategy (91.210)	83
Barriers to Affordable Housing (91.210 (e) and 91.215 (f))	86
HOMELESS	89
Homeless Needs (91.205 (b) and 91.215 (c))	89
Priority Homeless Needs	91
Homeless Inventory (91.210 (c))	93
Homeless Strategic Plan (91.215 (c))	93
Emergency Shelter Grants (ESG)	110
COMMUNITY DEVELOPMENT	111
Community Development (91.215 (e))	111
Antipoverty Strategy (91.215 (h))	119
Low Income Housing Tax Credit (LIHTC) Coordination (91.315 (k))	122
NON-HOMELESS SPECIAL NEEDS	123
Specific Special Needs Objectives (91.215)	123
Non-homeless Special Needs (91.205 (d) and 91.210 (d)) Analysis (including HOPWA)	124
Housing Opportunities for People with AIDS (HOPWA)	128
Specific HOPWA Objectives	134
OTHER NARRATIVE	135

GENERAL

Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

3-5 Year Strategic Plan Executive Summary:

EXECUTIVE SUMMARY

This Consolidated Plan provides a basis and strategy for the use of federal funds granted to the City of Lowell by the U.S. Department of Housing and Urban Development (HUD) under the Community Development Block Grant (CDBG), Home Investment Partnership (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs. This Consolidated Plan covers the period beginning July 1, 2010 through June 30, 2015, including five program years. Programs and activities described in this plan are intended to primarily benefit low-income and moderate-income residents of the City of Lowell, neighborhoods with high concentrations of low-income and moderate-income residents, and the city as a whole. HOPWA funds will be distributed to eligible activities throughout Middlesex County. The City also uses this plan to coordinate with other federal and state grant programs and local initiatives.

This plan is the product of extensive public outreach, multiple public hearings, and consultation with over 100 agencies, groups, and organizations involved in the development of affordable housing, creation of job opportunities for low-income and moderate-income residents, and/or provision of services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons. A complete draft of this plan has been made available for public review and comment for a 30-day period beginning March 22, 2010. The availability of both the draft plan and the final plan is advertised in the local newspaper and the complete documents are available for review on the City's website (www.lowellma.gov) and in print form at the Division of Planning and Development, the Pollard Memorial Library, and the Office of the City Clerk.

VISION

In 2003, the Lowell City Council endorsed a Comprehensive Master Plan for the City of Lowell. The Master Plan established a comprehensive and shared vision of the future with four core components (a complete copy of the Master Plan can be viewed on the City's website at http://www.lowellma.gov/depts/dpd/master_plan):

1. Lowell should be a "lifetime city," a place where people can enjoy all stages of life at a variety of income levels. People should be able to find desirable, appropriate, and affordable residential opportunities for all stages of life within Lowell's city limits.
2. Lowell should have a creative workforce that supports a diverse base of employment, retail, and commercial opportunities that meet the needs of the

- community and capitalizes on the City's historic, cultural, natural, and educational resources.
3. Lowell should offer a high quality of life for both current and new residents, while striving to protect and promote the unique character of its neighborhoods.
 4. Lowell should retain an independent identity as a unique city, even as it becomes more closely connected to Greater Boston, to preserve the community's pride of place.

Building on the community vision established by the Master Plan, the Consolidated Plan anticipates using the CDBG, HOME, ESG, and HOPWA programs to support activities which:

1. Help ensure that Lowell can be a "lifetime city," particularly for those for whom the affordability of housing is a primary impediment.
2. Provide training, education, and employment opportunities to help expand Lowell's workforce particularly by lifting low-income and moderate-income residents into stronger positions in that workforce.
3. Strengthen, preserve, and enhance the physical character and quality of life in Lowell's neighborhoods, including the housing stock, and the public infrastructure and facilities, with particular emphasis on the low-income and moderate-income neighborhoods and those areas that benefit all residents of this primarily low-income and moderate-income City.
4. Continue to build the capacity of residents to empower themselves to help strengthen their community, address problems, and develop pride in their City.

AVAILABLE FUNDS

The priorities and accomplishment goals outlined in this document are based on assumptions about future funding levels for the Consolidated Plan programs. In all cases, the City of Lowell has used the presumption of level-funding of each program at Federal Fiscal Year 2010 levels as outlined below. Because these programs are subject to annual Congressional appropriations as well as potential changes in funding distribution formulas or the number of communities eligible to receive entitlement grants, the accomplishment projections and planned activities are subject to change with availability of funding.

	CDBG	HOME	ESG	HOPWA	TOTAL
Estimated Annual Entitlement	\$2,560,000	\$1,185,000	\$105,000	\$650,000	\$4,500,000
Estimated Annual Program Income	\$25,000	\$25,000	\$0	\$0	\$50,000
Estimated Annual Funds Available	\$2,585,000	\$1,210,000	\$105,000	\$650,000	\$4,550,000
Five-Year Total Estimated Funds Available	\$12,925,000	\$6,050,000	\$525,000	\$3,250,000	\$22,750,000

RECOVERY ACT PROGRAMS

In addition to the dollars detailed in the table above, the City of Lowell has been allocated approximately \$5,562,000 in funds through new programs initiated through the American Recovery and Reinvestment Act of 2009. Many activities that are supported by annual entitlement funds are also receiving assistance through the

Recovery Act. These additional dollars allow programs to increase capacity and provide improved levels of service to Lowell's low- and moderate-income residents. A summary of the planned use of these dollars is described below.

- Community Development Block Grant – Recovery (CDBG-R): The City will utilize approximately \$630,000 in CDBG-R funds to support activities that create new jobs and other economic stimulus activities including infrastructure improvements in Lowell's Downtown business district.
- Lead Hazard Control Grant: \$3,000,000 in grant funds will be used for lead-paint abatement projects in Lowell and surrounding communities.
- Homelessness Prevention/Rapid Re-Housing Program (HPRP): \$978,000 in HPRP funds will be dispersed to local service agencies to provide financial assistance and relocation/stabilization support to help individuals and families at-risk of becoming homeless and to rapidly re-house households in permanent affordable housing.
- Energy Efficiency and Conservation Block Grant (EECBG) Program: The City will allocate \$954,700 toward energy efficiency improvements on municipal buildings including the installation of renewal energy technology. A portion of funds will also be distributed through a revolving loan fund to support private property owners to support the cost of making energy efficiency improvements on their buildings.

In addition to these ARRA programs, the City of Lowell received \$1.2 million in Neighborhood Stabilization Program funds through the Massachusetts Department of Housing and Community Development. The City is using these funds to support the redevelopment of multi-unit affordable residential properties in neighborhoods impacted by the foreclosure crisis. An additional \$200,000 in Massachusetts NSP funds will be used for strategic demolition of vacant and blighted properties as part of neighborhood stabilization efforts.

SUMMARY OF PRIORITIES, GOALS, BUDGETS, AND ANTICIPATED ACCOMPLISHMENTS

The table below outlines the priority need categories that HUD has found to be eligible to be supported with Consolidated Plan program funds. The chart estimates the amount and percentage of total Consolidated Plan funds that will be spent on each priority need category during the five program years covered by this plan. Below each goal, high and medium priority objectives are also listed. The proposed funding amounts are constrained in many cases by program eligibility requirements and expenditure caps. Program administrative expenses are apportioned within the various priority need categories based on program regulations.

		PRIORITY
GOAL A: HOMELESS/HIV/AIDS - \$3,640,000 (16%)		
<u>Objectives:</u>		
1. Increase the number of homeless persons moving into permanent housing		HIGH
2. End chronic homelessness		HIGH
3. Provide housing and supportive services for persons with HIV/AIDS and their families		HIGH
GOAL B: NONHOMELESS SPECIAL NEEDS - \$227,500 (1%)		
<u>Objectives:</u>		
1. Increase range of housing options and related services for persons with special needs		MEDIUM
GOAL C: RENTAL HOUSING - \$4,095,000 (18%)		
<u>Objectives:</u>		
1. Increase the supply of affordable rental housing (particularly for households earning 50% of AMI or less)		HIGH
2. Improve the quality of affordable rental housing		HIGH
3. Improve access to affordable rental housing		MEDIUM
4. Improve access to affordable rental housing for minorities		MEDIUM
GOAL D: OWNER-OCCUPIED HOUSING - \$5,005,000 (22%)		
<u>Objectives:</u>		
1. Increase the availability of affordable owner housing		HIGH
2. Improve the quality of owner housing		HIGH
3. Improve access to affordable owner housing		HIGH
4. Improve access to affordable owner housing for minorities		HIGH
GOAL E: PUBLIC FACILITIES - \$3,640,000 (16%)		
<u>Objectives:</u>		
1. Improve quality/increase quantity of neighborhood facilities serving LMI persons		HIGH
2. Improve quality/increase quantity of facilities that benefit LMI teens and youth		HIGH
3. Improve quality/increase quantity of facilities that benefit seniors and the elderly		HIGH
GOAL F: INFRASTRUCTURE - \$1,820,000 (8%)		
<u>Objectives:</u>		
1. Improve quality/increase quantity of public improvements that benefit LMI persons		HIGH
GOAL G: ECONOMIC DEVELOPMENT - \$2,730,000 (12%)		
<u>Objectives:</u>		
1. Improve economic opportunities for LMI persons		HIGH
2. Remediate and redevelop brownfields		HIGH
GOAL H: PUBLIC SERVICES - \$1,592,500 (7%)		
<u>Objectives:</u>		
1. Improve services for LMI persons		HIGH
2. Improve services for LMI youth and teens		HIGH
3. Improve services for seniors and the elderly		MEDIUM
4. Improve services for disabled adults		MEDIUM

The plan contemplates allocating program funding to the four primary Master Plan thematic areas as follows.

	Estimated Total Funding	Percentage of Funding
Lifetime City	\$12,740,000	56%
Economic Development	\$2,275,000	10%
Neighborhood Character	\$4,550,000	20%
Capacity Building	\$3,185,000	14%

Funding under HUD's priority needs categories will allow the City to achieve the following specific community goals:

MASTER PLAN GOALS

- Support activities that help achieve the goals of the 2003 Comprehensive Master Plan

HOUSING

- Expand housing opportunities in Lowell's Downtown
- Redevelop vacant and abandoned properties
- Support the Julian D. Steele Replication and Reinvention Plans
- Implement the goals of the City's 10-Year Plan to End Homelessness
- Maintain access to homeownership
- Improve the quality of the City's housing stock

NEIGHBORHOOD PRIORITIES

- Support revitalization efforts in the Hamilton Canal District including infrastructure improvements, development of new affordable housing units, and economic development initiatives that create new jobs
- Support the implementation of the JAM Urban Renewal Plan and the Acre Urban Renewal Plan
- Support the preservation of existing/creation of new open space and parks/recreation opportunities in neighborhoods
- Support physical improvements in neighborhood business districts
- Promote walkability and connectivity between neighborhoods
- Support targeted investment in Lowell's low- and moderate-income neighborhoods through the Manager's Neighborhood Improvement Initiative

PUBLIC SERVICE NEEDS

- Maximize collaboration and partnerships among social service agencies to help target resources to meet the highest needs and reduce duplication of services
- Support programs that help lift individuals out of poverty and promote self-sufficiency

SUSTAINABILITY

- Invest resources in projects that contribute to the City's goal of reducing energy usage and green house gas emissions.
- Promote energy conservation in public facility improvements and housing development/rehabilitation in an effort to improve affordability
- Improve access to alternative forms of transportation including walking, bicycling and trolley
- Other state and federal resources including Energy Efficiency and Conservation Block Grant funds are more likely to be used to further these goals than Consolidated Plan funds, but when possible, the City will encourage recipients of entitlement funds to use energy star standards in their construction and consider other ways of reducing energy usage.

More detailed priorities and accomplishment projections for Housing, Community Development, Homeless and Special Needs populations, as well as HOPWA program activities and anticipated accomplishments are presented in the appropriate narrative sections and tables within this document.

PERFORMANCE AND OUTCOME MEASUREMENT

To facilitate the assessment of performance and the tracking of results nationally, HUD has adopted a uniform performance measurement system. This system will allow HUD to aggregate results across the broad spectrum of local programs funded by these block grants so that the impact of housing and community development programs can be measured at the national level.

HUD's performance measurement system combines three statutory objectives - to provide decent housing, to provide a suitable living environment, and to expand economic opportunities - with three outcome categories:

- **Availability/Accessibility.** This outcome category applies to activities that make services, infrastructure, public services, public facilities, housing, or shelter available or accessible to low-and moderate-income people, including persons with disabilities. In this category, accessibility does not refer only to physical barriers, but also to making the affordable basics of daily living available and accessible to low and moderate income people where they live.
- **Affordability.** This outcome category applies to activities that provide affordability in a variety of ways in the lives of low- and moderate-income people. It can include the creation or maintenance of affordable housing, basic infrastructure hook-ups, or services such as transportation or day care.
- **Sustainability: Promoting Livable or Viable Communities.** This outcome applies to projects where the activity or activities are aimed at improving communities or neighborhoods, helping to make them livable or viable by providing benefit to persons of low- and moderate-income or by removing or eliminating slums or blighted areas, through multiple activities or services that sustain communities or neighborhoods.

The City of Lowell has been utilizing logic models which incorporate outcome measures in program planning, project applications, and contracts since 2004. With the announcement of HUD's new performance measurement framework during the 2005-06 program year, the City began refining its planning, project selection, contracting, reporting, and monitoring processes to streamline the implementation of the new framework. The City has established goals and objectives for the Consolidated Plan period that address HUD's outcome statements.

Decent Affordable Housing

Specific Objective #	Objective/Outcome Specific Annual Objective	Source of Funds	Performance Indicators	Five Year Goals
DH-1	Increase Availability/Accessibility of Decent Affordable Housing			
DH-1.1	Improve the availability of affordable housing through the creation of new housing units	HOME	Number of permanent affordable housing units created	100
DH-1.2	Improve the ability of LMI households with HIV/AIDS to remain in decent affordable housing units	HOPWA	Number of households receiving housing-related supportive services	1,720
DH-1.3	Sustain quality standards of affordable housing	CDBG	Number of units inspected for compliance with health and sanitary codes	7,200
DH-1.4	Support homebuyers with pre- and post-purchase counseling services	CDBG	Number of households assisted with homebuyer counseling	400
DH-2	Improve the Affordability of Decent Affordable Housing			
DH-2.1	Improve the affordability of homeownership	HOME	Number of households purchasing a home as a result of receiving pre-purchase counseling and downpayment assistance	175
DH-2.2	Improve the affordability of housing through rehabilitation assistance	HOME	Number of housing units assisted with repairs and lead-paint abatement	175
		CDBG		
DH-2.3	Improve the affordability of housing through increased fuel efficiency	CDBG	Number of households receiving fuel assistance services	225
DH-2.4	Identify and afford decent housing for LMI households with HIV/AIDS with financial assistance and services	HOPWA	Number of homeless or at-risk households assisted in finding decent affordable housing	140

Suitable Living Environment

Specific Objective #	Objective/Outcome Specific Annual Objective	Source of Funds	Performance Indicators	Five Year Goals
SL-1	Increase Availability/Accessibility of the Suitable Living Environment			
SL-1.1	Increase opportunities for LMI youth through educational, recreational, leadership-development programs	CDBG	Number of youth participating in programs	3,570
SL-1.2	Improve availability and accessibility of programs that maintain and enhance the quality of life for the elderly and special needs populations	CDBG	Number of individuals receiving services	32,100
SL-1.3	Support programs that provide emergency food and shelter to homeless and at-risk households	CDBG	Number of individuals receiving services	37,510
SL-1.4	Increase availability and accessibility of public facilities for LMI youth, elderly, and special needs populations	CDBG	Number of new public facilities created or existing facilities renovated	15
SL-2	Improve the Affordability of a Suitable Living Environment			
SL-2.1	Improve the affordability of a LMI households living environment through the provision of household goods	CDBG	Number of households receiving furnishing and household goods to equip them for new apartments	825
SL-3	Improve the Sustainability of a Suitable Living Environment			
SL-3.1	Improve the City's public infrastructure and public parks	CDBG	Number of infrastructure/park projects completed	5
SL-3.2	Sustain City neighborhoods through activities that improve the physical environment	CDBG	Number of neighborhood improvement projects	160
SL-3.3	Sustain City neighborhoods through demolition of vacant and abandoned properties	CDBG	Number of vacant/abandoned properties demolished	10

Economic Opportunities

Specific Objective #	Objective/Outcome Specific Annual Objective	Source of Funds	Performance Indicators	Five Year Goals
EO-1	Increase the Availability/Accessibility of Economic Opportunities			
EO-1.1	Support programs that provide LMI residents with training and technical support to obtain employment	CDBG	Number of individuals receiving employment-related services	765
EO-1.2	Support new businesses with small business loans and technical assistance	CDBG	Number of businesses receiving assistance (Jobs created/retained will also be reported upon completion of assistance)	95
EO-1.3	Increase the availability and accessibility of jobs for LMI persons through financial incentive programs to businesses relocating to the City	CDBG	Number of businesses receiving assistance (Jobs created/retained will also be reported upon completion of assistance)	500

Strategic Plan

Due every three, four, or five years (length of period is at the grantee's discretion) no less than 45 days prior to the start of the grantee's program year start date. HUD does not accept plans between August 15 and November 15.

Mission:

MISSION STATEMENT

In 2003, the Lowell Planning Board and the Lowell City Council endorsed a Comprehensive Master Plan to guide the continued redevelopment of the City over the next twenty years. In approving this plan, they endorsed a vision that was developed following an extensive outreach campaign conducted in 2001-2003, involving more than 1200 residents, business, political, and community leaders, to define goals, objectives, policies, and recommendations for the City.

The Master Plan identified two major trends that Lowell will capitalize on. First, after decades of large-scale out-migration from urban centers, Americans from a wide range of backgrounds have begun to once again recognize the vitality and energy of cities and embrace them as unique and desirable places to live. Secondly, as the nation's economy has become increasingly driven by service and knowledge-based industries, corporate location decisions are being driven primarily by access to creative and educated employees who can adapt to today's ever changing work environments. These Creative Class individuals that employers are seeking tend to live in communities that are diverse, lively, possess unique character, and offer a wealth of opportunities for a high quality of life. Lowell's renaissance of the past 25 years has enabled the City to preserve and enhance these very qualities in the community, and the master planning process is designed to build upon the momentum caused by recent revitalization efforts.

Building on these trends, the Master Plan established a comprehensive and shared vision of the future with four core components (the complete Master Plan can be found on the City's website at http://www.lowellma.gov/depts/dpd/master_plan):

1. Lowell should be a "lifetime city," a place where people can enjoy all stages of life at a variety of income levels. People should be able to find desirable, appropriate, and affordable residential opportunities for all stages of life within Lowell's city limits.
2. Lowell should have a creative workforce that supports a diverse base of employment, retail, and commercial opportunities that meet the needs of the community and capitalizes on the City's historic, cultural, natural, and educational resources.
3. Lowell should offer a high quality of life for both current and new residents, while striving to protect and promote the unique character of its neighborhoods.
4. Lowell should retain an independent identity as a unique city, even as it becomes more closely connected to Greater Boston, to preserve the community's pride of place.

This five-year Consolidated Plan provides a blueprint to use the CDBG, HOME, ESG, and HOPWA programs to assist in the implementation of this vision between July 1, 2010 and June 30, 2015, particularly for the low-income and moderate-income residents of the City. The Consolidated Plan anticipates supporting programs to:

1. Help insure that Lowell can be a “lifetime city,” particularly for those for whom the affordability of housing is a primary impediment.
2. Provide training, education, and employment opportunities to help expand Lowell’s workforce particularly by lifting low-income and moderate-income residents into stronger positions in that workforce.
3. Strengthen, preserve, and enhance the physical character of and quality of life in Lowell’s neighborhoods, including the housing stock, and the public infrastructure and facilities, with particular emphasis on the low-income and moderate-income neighborhoods and those areas that benefit all residents of this primarily low-income and moderate-income City.
4. Continue to build the capacity of residents to empower themselves to help strengthen their community, address problems, and develop pride in their City.

General Questions

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed.
2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) and the basis for assigning the priority (including the relative priority, where required) given to each category of priority needs (91.215(a)(2)). Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.
3. Identify any obstacles to meeting underserved needs (91.215(a)(3)).

3-5 Year Strategic Plan General Questions response:

1. GEOGRAPHIC AREAS OF THE JURISDICTION

Lowell, Massachusetts, the nation's first successful planned industrial community, is located in northern Middlesex County in the northeastern section of Massachusetts. The city is bisected by the Merrimack River and is located approximately 25 miles north of Boston. Lowell has a land area of 13.38 square miles with the remaining 0.89 square miles covered by surface water. The total area within the Lowell city border is 14.27 square miles. The major bodies of water that have had tremendous impact on the development and success of the City are the Merrimack River and the Concord River.

The city is a diverse urban/suburban community built primarily around the extensive industrial mill complexes along the Merrimack River. The industrial revolution of the 19th Century gave the city its economic base, heritage, and character that are still prevalent today. Today, the city can be characterized as a highly urbanized community surrounded by wealthier suburban middle and upper-middle class communities including Billerica, Chelmsford, Dracut, Tewksbury, and Tyngsborough.

As of the 2000 U.S. Census, Lowell was home to 105,167 people, 39,407 of whom were members of minority groups (including White Latinos). Since 1980, Lowell has been experiencing significant growth in its minority populations. The largest and fastest growing of these includes Southeast Asians and Latinos. The following table illustrates these trends, which are expected to continue over the coming five years. Areas of minority concentration are shown on the map below.

Population by Race & Ethnicity

	1980	1990	2000	2006-2008 ACS Estimates
Total Population	92,418 (100%)	103,439 (100%)	105,167 (100%)	98,766 (100%)
White (%)	88,596 (95.9%)	84,048 (81.3%)	72,145 (68.6%)	61,687 (62.5%)
Black (%)	1,205 (1.3%)	2,293 (2.2%)	4,423 (4.2%)	5,957 (6%)
Asian (%)	604 (0.7%)	11,549 (11.2%)	17,371 (16.5%)	17,651 (17.9%)
Other (%)	2,013 (2.2%)	5,568 (5.4%)	11,228 (10.7%)	14,471 (19.6%)
Latino (%)*	4,585 (5.0%)	10,089 (9.8%)	14,734 (14.0%)	15,694 (15.9%)

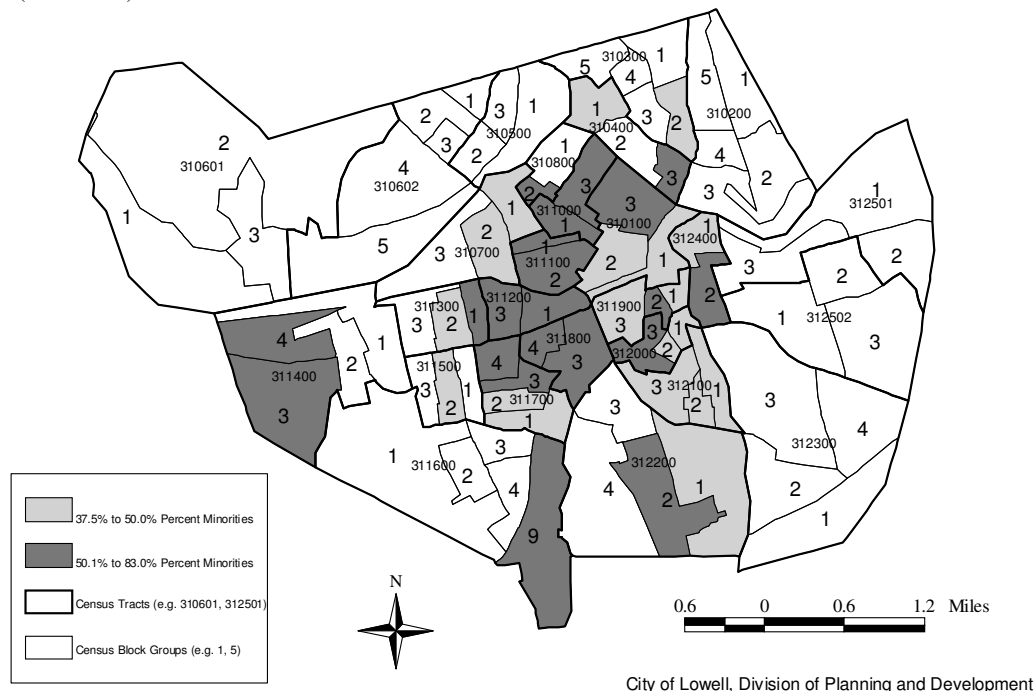
*May be of any race.

Source: U.S. Census Bureau

The U.S. Census 2006-2008 American Community Survey 3-Year Estimates are used to produce general Fact Sheets on communities with populations greater than 20,000 and are based on data collected over a 3-year period. The estimates represent the average characteristics of populations between January 2006 and December 2008 and do not represent a single point in time. The ACS does not capture demographic, housing, and economic statistics at the census tract and block group level. Therefore, in most instances the City will continue to rely on the 2000 Decennial Census data throughout this document until this level of information becomes available from the 2010 Census counts.

Minority Concentration by Census Block Groups

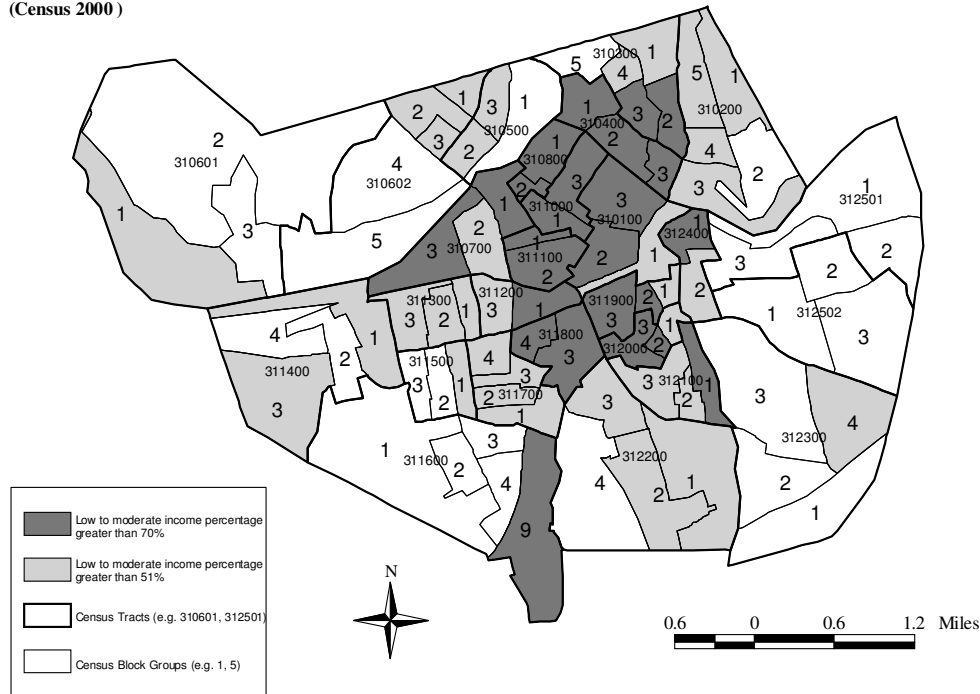
(Census 2000)



As of the 2000 U.S. Census, Lowell was home to 58,528 residents who earn less than 80% of the area median income and are therefore classified as low- or moderate-income by HUD. This represents 57.8% of the City-wide population for whom household income could be determined. The following map illustrates the block groups with the heaviest concentrations of low-income and moderate-income residents in Lowell. Consolidated Plan funds (except HOPWA) will generally be targeted toward these low-income and moderate-income neighborhoods or toward activities that benefit all residents of the city, a majority of whom are low- or moderate-income.

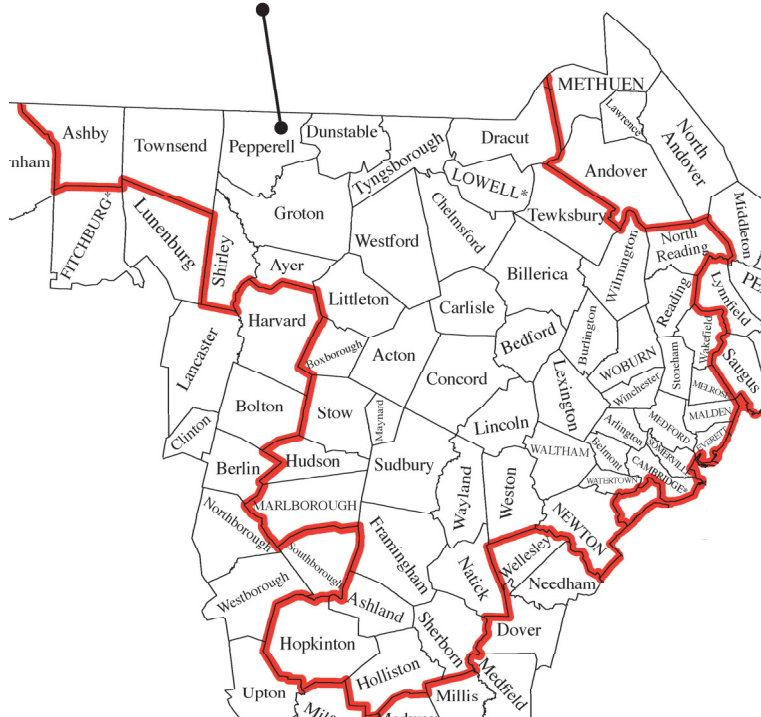
CDBG Priority Areas by Census Block Groups

(Census 2000)



Because Lowell is the most populous City in Middlesex County, MA, it is also an entitlement community for the HOPWA program. This block grant is designated to serve persons throughout Middlesex County who are living with HIV/AIDS and their families. For this program, funds will be allocated to eligible recipients county-wide whose programs serve this population. It is anticipated that the funds will be targeted to organizations whose service areas include the urban centers within the County, including Lowell, Cambridge, Somerville, and Framingham, where the greatest percentage of persons with HIV/AIDS reside.

Middlesex County



2. BASIS FOR ALLOCATION OF FUNDING

GEOGRAPHIC ALLOCATION

Because the primary national objectives of the Consolidated Plan programs are to benefit low-income and moderate-income residents, Lowell's block grant program funds will be targeted to low-income and moderate-income neighborhoods and activities that benefit the City as a whole, the majority of whose residents are low- or moderate-income. The maps above illustrate these areas.

PRIORITY NEEDS

Guided by the eligibility requirements of the various Consolidated Plan programs, the City of Lowell recognizes the following priority need categories for the five-year planning period. Relative priorities and target funding proportions were established through the synthesis of the needs information obtained through the plan development process described elsewhere in this document. A core component of the public outreach in preparing this plan was to prioritize among a lengthy list of real needs given the limited amount of funding available through the Consolidated Plan programs.

		PRIORITY
GOAL A: HOMELESS/HIV/AIDS - \$3,640,000 (16%)		
<u>Objectives</u>		
1. Increase the number of homeless persons moving into permanent housing		HIGH
2. End chronic homelessness		HIGH
3. Provide housing and supportive services for persons with HIV/AIDS and their families		HIGH
GOAL B: NONHOMELESS SPECIAL NEEDS - \$227,500 (1%)		
<u>Objectives:</u>		
1. Increase range of housing options and related services for persons with special needs		MEDIUM
GOAL C: RENTAL HOUSING - \$4,095,000 (18%)		
<u>Objectives:</u>		
1. Increase the supply of affordable rental housing (particularly for households earning 50% of AMI or less)		HIGH
2. Improve the quality of affordable rental housing		HIGH
3. Improve access to affordable rental housing		MEDIUM
4. Improve access to affordable rental housing for minorities		MEDIUM
GOAL D: OWNER-OCCUPIED HOUSING - \$5,005,000 (22%)		
<u>Objectives:</u>		
1. Increase the availability of affordable owner housing		HIGH
2. Improve the quality of owner housing		HIGH
3. Improve access to affordable owner housing		HIGH
4. Improve access to affordable owner housing for minorities		HIGH
GOAL E: PUBLIC FACILITIES - \$3,640,000 (16%)		
<u>Objectives:</u>		
1. Improve quality/increase quantity of neighborhood facilities serving LMI persons		HIGH
2. Improve quality/increase quantity of facilities that benefit LMI teens and youth		HIGH
3. Improve quality/increase quantity of facilities that benefit seniors and the elderly		HIGH
GOAL F: INFRASTRUCTURE - \$1,820,000 (8%)		
<u>Objectives:</u>		
1. Improve quality/increase quantity of public improvements that benefit LMI persons		HIGH
GOAL G: ECONOMIC DEVELOPMENT - \$2,730,000 (12%)		
<u>Objectives:</u>		
1. Improve economic opportunities for LMI persons		HIGH
2. Remediate and redevelop brownfields		HIGH
GOAL H: PUBLIC SERVICES - \$1,592,500 (7%)		
<u>Objectives:</u>		
1. Improve services for LMI persons		HIGH
2. Improve services for LMI youth and teens		HIGH
3. Improve services for seniors and the elderly		MEDIUM
4. Improve services for disabled adults		MEDIUM

OBSTACLES TO MEETING UNDERSERVED NEEDS

The primary obstacle to meeting all of the identified needs, including those identified as priorities, is the general lack of funding resources available to the public and private agencies who serve the needs of low-income and moderate-income residents. In recent years, the Commonwealth of Massachusetts has reduced funding for local aid to cities and towns, housing, community development, social services, education,

homeless services, economic development, recreation, and public health programs in an attempt to counter the effects of stagnant tax collections, escalating health insurance obligations, and rising costs of service delivery. Many private foundations which have historically aided municipalities and not-for-profit organizations dedicated to addressing Consolidated Plan needs have seen their endowments substantially reduced by declines in the stock market since 2000. As a result, the major foundations serving the Lowell area have all reduced their giving in recent years. The City of Lowell's municipal budget has been stretched to overcome the substantial reduction in local aid from the Commonwealth of Massachusetts from 2002-2009. Coupled with increasing health insurance and service delivery costs, these current levels have resulted in a hiring freeze and reductions of all department budgets. This leaves little room for expansion of community development funding at the local level. Finally, the City of Lowell's Consolidated Plan entitlement grant amounts have fluctuated in the past five years and in some cases not kept up with inflation. This makes it difficult to predict the amount of funds available from year to year and further limits availability of funds to address the needs in the community.

City of Lowell Consolidated Plan Resources FY 05 - FY 10

Fiscal Year	CDBG	HOME	ESG	HOPWA	Total	% Change	Boston CPI Change
2005-06	\$2,678,834	\$1,171,666	\$102,962	\$623,000	\$4,576,462		
2006-07	\$2,430,651	\$1,102,860	\$103,039	\$627,000	\$4,263,550	-6.84%	3.6%
2007-08	\$2,441,426	\$1,099,737	\$104,830	\$622,000	\$4,267,993	0.10%	0.8%
2008-09	\$2,357,503	\$1,066,457	\$105,193	\$644,000	\$4,173,153	-2.22%	6.3%
2009-10	\$2,391,579	\$1,187,783	\$104,958	\$658,318	\$4,342,638	4.06%	-3.4%
2010-11	\$2,602,583	\$1,185,242	\$105,059	\$702,955	\$4,595,839	5.83%	N/A

Source: HUD, Federal Reserve Bank of Boston

Managing the Process (91.200 (b))

1. Lead Agency. Identify the lead agency or entity for overseeing the development of the plan and the major public and private agencies responsible for administering programs covered by the consolidated plan.
2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.
3. Describe the jurisdiction's consultations with housing, social service agencies, and other entities, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons.

*Note: HOPWA grantees must consult broadly to develop a metropolitan-wide strategy and other jurisdictions must assist in the preparation of the HOPWA submission.

3-5 Year Strategic Plan Managing the Process response:

1. LEAD AGENCY

As the entitlement grantee for the CDBG, HOME, ESG, and HOPWA programs, the City of Lowell's Division of Planning and Development (DPD) is the lead agency for the development of this five-year consolidated plan as well as the Annual Action Plans that outline the proposed activities and expenditures under these programs. The DPD will also act as one of several public and private agencies that will administer programs and activities under the plan. The DPD oversees planning, economic development, community development, housing, lead paint abatement, Historic Board, and urban renewal programs. Other major agencies and organizations that will administer programs include:

City of Lowell	
Council on Aging	Parking Department
Fire Department	Department of Parks and Recreation
Health Department	Police Department
Hunger/Homeless Commission	Department of Public Works
Information Technology Department	Wastewater Utility
Inspectional Services Department	Water Utility
Division of Neighborhood Services	
Other Public Organizations	
City of Cambridge	Town of Framingham
Lowell Housing Authority	University of Massachusetts – Lowell
Mass. Department of Public Health – Office of AIDS	UMass Lowell Research Foundation
Middlesex Community College	
Private Organizations and Agencies	
Acre Family Day Care Center	Lowell Parks & Conservation Trust, Inc.
AIDS Action Committee	Lowell Transitional Living Center, Inc.

AIDS Housing Corporation	Mass Alliance of Portuguese Speakers
Alternative House	Mental Health Assoc of Greater Lowell
Angkor Dance Troupe	Merrimack Valley Catholic Charities
Asian Task Force Against Domestic Violence	Merrimack Valley Food Bank, Inc.
Big Brother/Big Sister	Merrimack Valley Housing Partnership
Boys & Girls Club of Greater Lowell, Inc.	Metropolitan Boston Housing Partnership
Cambodian Mutual Assistance Association	Open Pantry of Greater Lowell, Inc.
Cambridge Cares About AIDS	Rape Crisis Services of Greater Lowell
Central Food Ministry, Inc.	Recruitment Resources Consulting
Rebuild Together	Retarded Adult Rehab Assoc.
Coalition for a Better Acre	Southern Middlesex Opportunity Council
Community Teamwork, Inc.	Spindle City Corps
Girls, Inc.	Suitability
House of Hope, Inc.	The Community Family, Inc.
Institute for Health and Recovery	Tri-City Community Action Program
Justice Resource Institute	United Teen Equality Center (UTEC)
Latin American Health Institute	West End GYM, Inc.
LifeLinks	YMCA
Lowell Association for the Blind, Inc.	YWCA
Lowell Community Health Center	

2. PLAN DEVELOPMENT PROCESS

The City of Lowell has embraced a process for the development of this five-year consolidated plan that included broad participation from the community. This process began with the City's Comprehensive Master Plan which was adopted in 2003 and has continued through the preparation of this document and will remain in effect throughout the upcoming five year period through the Citizen Participation Process outlined below. At each step in the process care has been taken to ensure that low-income and moderate-income residents, members of minority groups, agencies involved in the provision of services to these populations, and others who are directly impacted by the programs and projects supported by the Consolidated Plan programs have been actively involved.

MASTER PLAN PUBLIC OPINION RESEARCH

This five-year Consolidated Plan is grounded in part on the extensive public participation that was conducted in support of the 2002-2003 Master Plan process. That outreach effort included a 1001 household telephone survey conducted in five languages. Careful scientific sampling techniques were used to ensure proportional representation among various minority, geographic, age, and income groupings. The survey reached 273 households earning below \$30,000 annually and 233 households earning between \$30,000 and \$49,999 annually. The Master Plan outreach effort also included an extensive telephone survey of businesses, several resident focus groups, and interviews with 60 community leaders.

The questions asked in the household survey included a number which were designed to obtain input on residents' priorities for their community along with a

corresponding evaluation of how the City of Lowell was performing in these areas. The table below summarizes the opinions of the low-income and moderate-income residents who were surveyed. The importance and performance indexes rate survey responses using a scale which assigns a score of 100 to an average response. The "Gap" represents the difference between the value that residents place on a particular issue and their assessment of the Lowell's performance in addressing that issue.

In preparation of the 2010-2015 Consolidated Plan, the City re-released part of this survey to assess how public opinion may have changed. This feedback will help the City prioritize funds during the next 5-Year period. In this instance, it is worth noting some changes in the survey method and outreach compared to 2002-2003. The updated survey was released during the month of February 2010 using an on-line survey tool. The availability of the survey was announced on the City's website as well as through a wide-reaching email distribution list that included more than 100 local non-profit service agencies, affordable housing developers, the Lowell Housing Authority, local businesses, and neighborhood groups. In addition, hard copies of the surveys were available at six social service agencies including the Lowell Community Health Center, Lowell Council on Aging, and Community Teamwork Inc. a regional Community Action Agency. As a result of this outreach, the City received 552 responses. 52% of respondents have lived in Lowell for 10 years or longer. About 28% of responses were generated from residents of Downtown. 15% from the Highlands neighborhood 30% of respondents are renters and more than 40% work in Lowell.

With few exceptions, most issues of greatest importance to the 2010 respondents match those from responses collected in 2003. Public safety, job opportunities, and transportation are still important to Lowell residents. Among these, the issues about which respondents feel the City should be doing more include reducing drug activity, creating jobs, and improving walkability and connectivity of Lowell's pedestrian and vehicular pathways. Respondents identified large gaps between the City's performance and the issue's importance on conditions of streets and sidewalks, parking, property taxes, police presence, public transportation, and variety of retail options downtown. The greatest increase in gap performance between 2003 and 2010 exists in affordability of housing which rose from -14 to +10. This may be the result of not isolating low- and moderate-income responses in the survey results as was done in 2003 rather than a true reflection on the affordability of housing in Lowell.

Community Characteristics	2003 Survey Results			2010 Survey Results		
	Importance Index	Performance Index	Gap	Importance Index	Performance Index	Gap
Lots of job opportunities for me in the city	95	83	-12	112	77	-35
No noticeable drug activity	124	94	-30	126	93	-33
Traffic that moves freely through town	93	89	-4	108	79	-30
Convenient pathways for pedestrians and bicyclists	93	90	-3	108	81	-28
Streets and walkways are well designed	93	93	0	108	83	-26
Well-maintained roads and sidewalks	93	89	-4	108	85	-23
Enough parking	93	84	-9	108	92	-17
A place where I feel safe	124	109	-15	126	112	-14
A police presence in my neighborhood	124	106	-18	126	112	-14
Reasonable property taxes	107	87	-20	107	93	-14
Good public transportation	93	107	14	108	95	-14
A good variety of stores downtown	83	86	3	98	85	-13
A clean and attractive city	107	100	-7	108	95	-13
Good public schools	113	106	-7	111	99	-12
Stores in my neighborhood that meet my basic shopping needs	83	99	16	98	93	-5
Not feeling crowded in my neighborhood	107	105	-2	108	106	-2
Residents are well informed about the city	99	102	3	94	94	-1
Neighbors who get along well	107	107	0	108	107	-1
Residential housing is well- maintained	100	100	0	93	98	5
Downtown restaurants and cafes open later in the evening	83	92	9	98	104	6
Good quality drinking water	106	97	-9	107	113	6
Good selection of housing that I can afford	100	86	-14	93	103	10
Good snow removal	99	102	3	94	104	10
Positive engagement for at-risk youth	n/a	n/a	n/a	89	98	10
Assistance for individuals and families to meet their basic needs	n/a	n/a	n/a	89	100	12
Good recycling program	99	112	13	94	107	12
Everyone is treated fairly by city officials	92	100	8	80	94	14
A city that preserves its historic places	107	119	12	108	124	16
English classes offered at convenient times and places	92	107	15	80	98	19
Good trash removal	99	118	19	94	117	23
Parks and recreational areas that meet my needs	79	103	24	78	101	23
Lots of positive activities for children and teens	79	100	21	78	101	24
Programs and activities for seniors				89	113	24
Plenty of cultural activities	79	112	33	78	120	43
Plenty of public events and festivals	79	116	37	78	124	47

HOPWA SERVICE PROVIDERS SURVEY

As the largest city in Middlesex County, Lowell is responsible for administering the HOPWA grant countywide. In 2007, AIDS Housing Corporation, a technical assistance provider, completed a needs assessment for individuals with HIV/AIDS and their families. This report which included both public health data as well as input from Middlesex County HOPWA service providers will continue to help guide the use of HOPWA funds through the Consolidated Plan period.

Four specific recommendations were made in the AHC Needs Assessment:

1. Use HOPWA monies to serve those hardest to house
2. Provide funding for TBRA within the Greater Lowell area
3. Provide funding for Housing Information Service activities in the Greater Lowell area
4. Prioritize funding for services that receive little or no funding outside of HOPWA

In preparation of the Consolidated Plan the City released a survey to HOPWA service providers to assess their level of need, resources, and challenges. Based on responses, the most significant barriers that service providers face in achieving their goals is the affordability of housing, clients' criminal justice history, and multiple diagnosis. Emergency rent and utility assistance remains the highest need for clients facing housing issues. This feedback signifies a need to support rental assistance programs and specifically ones that target those hardest to house that might need solid case management and supportive services.

PLAN DEVELOPMENT

In addition to the gap analysis conducted in February, the City has initiated numerous public outreach events in conjunction with recent planning efforts. These planning activities have ranged in size and scope from reviewing downtown improvements and designs for the new Hamilton Canal District, both of which while geographically focused, have citywide impacts; to smaller scale projects that effect residents and businesses of a specific neighborhood. In each case the City provided several opportunities for public input and comment. These outreach efforts have shaped the development of the 2010-2015 Consolidated Plan.

Hamilton Canal District "Vision Sessions"

As part of the master planning process for the City's Hamilton Canal District, the City of Lowell and selected Master Developer, Trinity Financial organized an extensive public planning process using a series of planning charrettes. The charrette process was intended to be a dynamic exercise that included baseline information gathering, significant stakeholder involvement, and public review and comment to maximize the opportunity for public input. The goal was for the outcome of the process to reflect a consensus among the participant stakeholders that their concerns had been considered and integrated within the Master Plan.

In the Fall of 2007, Trinity began an informal outreach to stakeholders in the community in order to understand the various perspectives regarding the site. This outreach targeted neighborhood groups, local community based organizations, City and State representatives, the National Park Service, the Massachusetts Division of

Capital Asset Management, the University of Massachusetts-Lowell, the media, individuals, businesses, abutters and others. Trinity and the City then commenced the planning of five major public charrettes, branded as the “Vision Sessions” between December 2007 and July 2008. The Vision Sessions were advertised in the Lowell Sun, on the City of Lowell’s website, the Hamilton Canal District website and posted at locations throughout the City. Trinity and the city also held approximately twenty smaller “Working Group Sessions.” Working Group Sessions were held in between the Vision Sessions and addressed specific concerns or issues dealing with the project plan. All Sessions were held in locations that were accessible to minorities and persons with disabilities. An attendance list can be found in the Appendix of this Document.

Public input and comments were received on several major themes including the role of the artists community, open space, traffic circulation and parking, urban design, connectivity with surrounding neighborhoods, and green building and sustainability. While the vast majority of funding to reinvigorate the Hamilton Canal District comes from other private sources, the City anticipates using Consolidated Plan funds during the 2010-2015 period to support early infrastructure improvements. Consolidated Plan funds will also be used to attract a vibrant variety of artists and other young professionals, including minorities, to the district through improved availability to fair market rate housing.

Gateway Cities Workshops

Planning for the Hamilton Canal District included significant amount of citizen participation. With support from the Massachusetts Department of Housing and Community Development’s Gateway Plus Action Grant, the City built on the momentum generated during the District visioning sessions to focus on the neighborhoods immediately surrounding the HCD. In collaboration with Goody Clancy, the City hosted a series of visioning sessions, or “Citybuilding Workshops,” within each of these neighborhoods—Downtown, The Acre, Lower Highlands, and Back Central beginning in August 2009. A cross-section of residents, businesspeople, community and institutional leaders, and others with a stake in the future of their neighborhood applied their local knowledge to the identification, within their respective neighborhoods, of opportunities and challenges that could—or should—be triggered by the District’s development (a representative list of attendees is located in the Appendix of this document).

Given Lowell’s extraordinarily complex and rich ethnic make-up as represented in these four neighborhoods, it was imperative that a diversity of opinion, culture, age, and background be reflected in the level and depth of participation in these visioning sessions and, ultimately, in the emerging recommendations. A particular effort was undertaken to bring into the conversations representatives from Lowell’s numerous immigrant populations.

To undertake outreach at a wide scale and depth, the consulting team began with a series of one-on-one meetings and interviews with representatives of community and interest groups from each of the four neighborhoods. The goal in each case was three-fold: (1) to understand each neighborhood’s social and ethnic dynamic, its physical assets and challenges, and its priorities; (2) to elicit early thoughts regarding the opportunities presented by the Hamilton Canal District; and (3) to take advantage of word-of-mouth, in addition to flyers, e-mail, and other media, as a means of promoting the workshops. It rapidly became clear that, especially for non-

English speaking members of the neighborhoods, the consulting team needed to meet with them at their convenience and at their familiar locales—whether the Casey Family Services that serves members of the Cambodian community or at a Lower Highlands church that serves members of the Latino community. In all instances, interpreters were on hand to serve as intermediaries, as the team explained the project and each community's role in making the project a success.

What began as a series of conversations regarding the impact of the Hamilton Canal District became, ultimately, an exploration of the implicit *citymaking* opportunities embedded in HCD's origins as a *placemaking* effort of singular ambition. Also in the Appendix, a chart displaying common themes from the workshops will be provided. The areas discussed include the following: Connections (in the physical, institutional and programmatic capacity), Business/ Economic Development, Arts, Culture, Institutions and Housing.

Downtown Summit

With the goal of including all stakeholders in the development of a vision for Downtown Lowell, the City Administration held a successful series of Downtown Summits, with three sessions spanning from January till June in 2007. Participants (including essentially all Downtown Businesses, residents, property owners, the National Park Service, The Lowell School Department, CTI and other non profits, museums, UMASS Lowell and Middlesex Community College) consistently attended all three sessions. Their input during these sessions assisted City staff to begin working on a number of improvements, some of which will be supported with Consolidated Plan funds.

Participants discussed a variety of topics including marketing, retail recruitment and retention, infrastructure, traffic, and parking. In response, the City, through partnerships with other public and private organizations, has begun implementing recommendations from the Summit. Among these improvements already underway are: installation of gateway signage and Victorian lighting, streetscape improvements, improved parking management, vault and field surveys, traffic studies and pavement evaluations.

While many of these improvements have been supported by private investment, the City anticipates using Consolidated Plan funds during the 2010-2015 Consolidated Plan period to support some of these recommendations including programs that assist downtown businesses with technical and financial assistance. Consolidated Plan funds may also be used to support pedestrian improvements and other small infrastructure projects that will improve the accessibility to downtown businesses, cultural activities, and public facilities.

Partnership for Change: 10 Year Plan to End Homelessness

In January 2007 the City launched a process to begin developing a 10-Year Plan to End Homelessness. More than 250 members of Lowell's business community, social service agencies, government leaders, and concerned citizens participated in the kick-off event with more than 100 attendees joining the Manager's 10-Year Plan Committee. Committee members met for approximately 3 months to discuss issues of housing for homeless individuals and families including homeless seniors and teens, jobs and education, case management and resources, as well as implementation and performance measurement. In April 2007 Phase I: Action Plan

to End Homelessness was completed. The City is currently operating under Phase II of this plan which focuses on implementing programs to achieve the goals of the Action Plan. An Executive Committee, which includes members of Greater Lowell's social service and business community, meets once a month with the City Manager to review progress. A separate task force is charged with identifying action steps, funding resources, and measurable accomplishments.

Neighborhood Impact Initiative

The Neighborhood Impact Initiative program has been a highly regarded effort led by the City Manager to have a more focused impact into low- and moderate-income areas within a specific neighborhood. This comprehensive program will help stabilize and revitalize neighborhoods through the concentrated investment of staff and financial resources from all City departments. By concentrating resources in a target area, the City hopes to maximize the value and impact of its actions and expenditures. Consistent with the recommendations of the Comprehensive Master Plan, particular focus will be paid to the commercial centers and public squares within CDBG-eligible neighborhoods, where impacts will be felt by the broadest possible cross-section of neighborhood residents. The initiative was launched during the 2009-2010 program year with significant investment from Consolidated Plan funds, as well as state and private resources. The Centralville neighborhood marked the City's first approach into a program of this manner.

An internal team for the City, consisting of representatives from the Division of Planning and Development, the Commissioner of Parks & Rec., the LPD, the Building Commissioner, Health Inspector, DPW Commissioner, City Engineer, and the City Manager, meets monthly to discuss the neighborhood in which they are active (one neighborhood will be chosen annually). This team also partakes in walking tours monthly with neighborhood leaders to gain a better perspective and gauge the progress of the area. These neighborhood leaders also attend meetings of the City's internal team. The City Manager also meets with neighborhood leaders quarterly in order to discuss City-wide issues that affect them. Concerns of Centralville residents include traffic safety, business assistance and betterments, police presence and neighborhood services, housing programs, DPW & ISD updates, and neighborhood input and issues.

The City will direct resources to a different neighborhood each year, with a goal of addressing all of Lowell's low- and moderate-income neighborhoods over a 5-6 year period. In each instance, involvement from neighborhood residents and business owners will be vital to the success of the program.

Lower Highlands MIT Study

In 2009, students from the Department of Urban Studies and Planning at MIT completed a plan for the Lower Highlands Neighborhood. The 13-week planning process consisted of interviews with community members and public officials, numerous site visits, and two community meetings (held October 28, 2009 and December 1, 2009) for gathering feedback. The fundamental goal of the study, as stated in the group's website: "is to create a more livable, vibrant, urban neighborhood for the existing community through five strategies: ecological interventions, streetscape and traffic improvements, enhancing walkability and connectivity to public transit options, housing & commercial development, and

identification of catalyst properties.”¹ In addition to neighborhood business owners and residents, representatives from the following organizations participated in this planning process:

119 Gallery	Keep Lowell Beautiful
Cambodian Mutual Assistance Association	Lowell Development Finance Corporation
Coalition for a Better Acre	Lower Highlands Neighborhood Association
Community Gardens Greenhouse	Pailin City Market and Restaurant
Cultural Organization of Lowell	Revolving Museum
Honorary Consulate General of Cambodia	UMass Lowell Community Relations Office
Iglesia Cristiana Ebenezer Asablea de Dios	

This public input led to the development of the 2009 Lowell Lower Highlands Neighborhood Plan. The document recommends focusing resources on four specific areas of the neighborhood: Pailin Plaza & Clemente Park; Nottingham Mills & the former RMV Site; Cupples Square; and the Charles A. Gallagher Transit Terminal. Recommendations include traffic calming measures through streetscape improvements, infrastructure improvements at recreational facilities, business incentive programs, the redevelopment of vacant and underutilized properties, as well as improved pedestrian access and safety to business, recreation, and transportation services. Implementation of these actions will likely be facilitated by a combination of both private and public resources.

Concord River Greenway

The Concord River Greenway Park is a multi-use trail through the heart of Lowell. A long-range goal of the Lowell Parks & Conservation Trust is to create a greenway park along the Concord River. The park will link the city’s largest park area, Shedd Park and Rogers Fort Hill Park, to the center of the city and a network of walkways that have been developed by the Lowell National Historic Park. The Concord River Greenway is also an integral part of the Bay Circuit Trail, which is a network of trails around greater Boston, from Duxbury on the South Shore to Ipswich on the North Shore.

This linear park will have the main feature of a multi-purpose trail constructed primarily on an abandoned railroad right-of-way paralleling the river. Through meetings and collaboration with the City’s Planning and Development, neighborhood residents/ groups, abutting businesses, students and artists, the project seeks to do the following:

- Preserve the natural beauty and character of the Concord River
- Preserve the historic corridor that includes mills, dams, and arch bridge,
- Provide a safe, viable transportation alternative between Lowell's neighborhoods and downtown.
- Provide a missing link in the Bay Circuit Trail, a 200-mile trail from Newburyport to Kingston, and connect to the Friends of the Bruce Freeman Rail Trail from Lowell to Framingham.

¹ MIT group’s website: <http://web.mit.edu/11.360/www/lowell09.html>

South Common Improvements

South Common is a prominent city park in Lowell, located on Thorndike Street across from Gallagher Terminal. Currently, some of the park features such as the amphitheatre are out-dated and unused, while others, like the playing field, are stressed from over-use. Safety is a problem and the site is in need of improvements and renovations. In 2009 Lowell began working with the landscape architecture firm of Brown, Richardson & Rowe (BR&R) on a master plan. Public meetings were held in September, October, and November of 2009 at the Pollard Memorial Library. Additional meetings with specific neighborhood groups were also held. Based on the input from these meetings, BR&R developed a Preferred Alternative plan.

The Preferred Alternative master plan shows a wide variety of improvements, including the following: new tennis courts, basketball courts and pool, upgrading the current playing field to a regulation-sized soccer field surrounded by an informal walking & exercise track, a redesigned amphitheater, improved pathways and circulation routes throughout, an added playground area, and the elimination of the parking lot near the existing pool in order to develop the east side as the “heart of the park” with a cluster of activities for all ages via seating, trees, landscaping, and site amenities.

The National Park Service’s trolley route runs through the park to Gallagher Terminal. The plan works with the already redesigned streetscape along Thorndike, which is scheduled to begin construction in 2010 and will improve access to Gallagher. Attendees at the public meetings generally supported the Preferred Alternative plan. They also expressed the desire for the following types of activities to take place on South Common: festivals, outdoor movies, farmer’s markets, cultural events, and public art with a theme. Parking was a general concern, both for park users and residents of the neighborhood.

PUBLIC HEARINGS AND COMMEND PERIODS

In addition to the targeted data collection and public participation efforts outlined above, the City of Lowell DPD and the Consolidated Plan Citizens Advisory Committee (CAC) conducted an open advertised public hearing at the Lowell Senior Center on December 10, 2009. This hearing included an introduction and explanation of the Consolidated Plan’s purpose and the process and schedule for its completion as well as an opportunity for interested persons to comment on past activities of the Consolidated Plan programs, identify needs, and propose strategies for addressing those needs.

Minimal public comment was received at this hearing. Discussion focused primarily on concerns about reduced program funding. Questions were also raised about the City’s efforts to encourage more collaboration among programs receiving Consolidated Plan funds, as well as the proposal evaluation process.

A public hearing was also held on January 21, 2010 at the Lowell Senior Center regarding project selection for the 2010-2011 program year. The ongoing five-year consolidated planning process was noted at this hearing but was not a major focus on the agenda.

A draft of the Consolidated Plan was available for public review and comment March 22, 2010 through April 23, 2010. A summary of comments received and the City's responses are included in the Citizen Participation section of this document.

Notice of the availability of the draft plan and the opportunity to comment on it was advertised in the *Lowell Sun*, the *Boston Globe*, posted in various public locations, and mailed directly to representatives from all of Lowell's abutting towns, the Massachusetts Department of Housing and Community Development (DHCD), and the Northern Middlesex Council of Governments (NMCOG), the regional planning agency for the Lowell area.

The City of Lowell and CAC held a second public hearing on April 1, 2010 at the Lowell Senior Center to allow interested parties time to review the draft document prior to being afforded an opportunity to present testimony on the document. This input was used to refine the document prior to publication of the final draft.

REQUEST FOR PROPOSAL (RFP)

The initial step of each Annual Action Plan's development process begins in November with the advertisement of the planning process, availability of funds, and the Request for Proposal (RFP). A schedule of the Annual Action Plan process and Request for Proposal is made available to all interested parties through an advertisement in the *Lowell Sun*, on the City's website, and through postings in English, Spanish, Portuguese, and Khmer. The notice of RFP availability was also e-mailed to all current subrecipients. Subrecipients without access to e-mail were informed of the process and the availability of the RFP by telephone. Notice of the availability of the separate HOPWA RFP was also advertised in the *Boston Globe*, which serves the larger Middlesex County HOPWA jurisdiction. Applications were available at the Division of Planning and Development. In addition, the RFP documents were available on-line via the City of Lowell's website at www.lowellma.gov.

The application deadline is typically 30-45 days after the announcement of the availability of funds. Many organizations and individuals seek and receive technical assistance from DPD in preparing the RFP. Participants have expressed appreciation of DPD's efforts to simplify the Request for Proposal process and to keep in touch with them by e-mail throughout the plan development process.

Typically, funds for all four Consolidated Plan programs are dispersed through a competitive RFP process and reviewed by a volunteer Citizen Advisory Committee. As part of the development of its next Five-Year Consolidated Plan, the City revised the process for selecting recipients of HOME funds. Rather than dispersing the City's full HOME award during a single application round, the City introduced a rolling application process for its FY 2010-2011 HOME funds. This change allows the City to consider qualified proposals that are presented throughout the year, depending on availability of funds and provides some flexibility for potential developers. In addition, a more complex application process was designed to correspond with the applications required for state funding through the Massachusetts Department of Housing and Community Development. This process reduces some of the burden for applicants and ensures that applicants have the capacity of understanding some of the complexities of affordable housing development. A selection committee made up of staff from DPD's Housing, Planning, and Community Development offices review

proposals. As with all Consolidated Plan funds, HOME awards require approval by the City Council.

The City has also made changes in the way it distributes HOPWA program funds. In an effort to help provide some consistency to project sponsors in designing their programs and planning project budgets, the City changed its Request for Proposal process for the 2010-2011 program year that allowed applicants to submit proposals for the use of HOPWA funds over a five-year term beginning July 1, 2010. This change also allows the City to help predict the level of accomplishments that may be achieved over the five-year Consolidated Plan period and helps to reduce the paperwork associated with annual applications and grant agreements. The City will draft grant agreements with selected project sponsors, eligible for renewal each year over the course of the next five years, subject to availability of funds and compliance with reporting requirements. Annual HOPWA appropriation to a selected activity will be adjusted to correspond with the City's annual allocation from HUD. For example, if the City's HOPWA entitlement decreases by 2% in year three of a five-year award, the activity award will likewise decrease by 2%. All seven agencies discussed in the HOPWA section of this document have been awarded five-year awards under this new process.

In order to provide room for flexibility and encourage new, innovative projects, the City will hold some funds aside each year to award to a new program that may not have historically received Lowell HOPWA funds. These funds may be awarded annually. Applications for these innovation funds will be reviewed on a rolling basis, as funding is available.

More discussion on the project selection process for all four entitlement programs is discussed in the Citizen Participation section of this document.

3. CONSULTATIONS

In developing this five-year Consolidated Plan, the Division of Planning and Development (DPD), acting as the lead plan development agency, has consulted with representatives from more than 100 agencies, groups, and organizations involved in the development of affordable housing, creation of job opportunities for low-income and moderate-income residents, and/or provision of services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons. In addition to the surveys, hearings, and other outreach efforts described above, DPD officials have met with representatives, staff, and members of the Lowell Housing Authority, the Continuum of Care, and the Disabilities Commission, since the development of the previous Consolidated Plan. Planning officials from abutting towns, DHCD, and NMCOG were given opportunities to participate in the Consolidated Planning process.

A copy of the final plan has also been sent to DHCD. Massachusetts has essentially eliminated counties as a unit of local government, with the exception of courts, legal record-keeping, and sheriff's departments. As a result, there is no appropriate county-level officials to contact regarding the Consolidated Plan.

Citizen Participation (91.200 (b))

1. Provide a summary of the citizen participation process.
2. Provide a summary of citizen comments or views on the plan.
3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.
4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

3-5 Year Strategic Plan Citizen Participation response:

1. CITIZEN PARTICIPATION PLAN

As required by the Department of Housing and Urban Development (HUD) Rules and Regulations, the City of Lowell complies with regulation 24 CFR 91.105, Citizen Participation Plan for local governments as outlined. The City has adopted a citizen's participation plan that sets forth the City's policies and procedures for citizen participation.

Citizen and community participation in the process of developing this Five-Year Consolidated Plan has been outlined in the discussion of the plan development process above.

ENCOURAGEMENT OF CITIZEN PARTICIPATION

The City of Lowell will enable citizens of the City to participate in the development of its Consolidated Plan, annual Action Plan, and any substantial amendments to the Consolidated Plan and required Consolidated Annual Performance and Evaluation Report (CAPER). The City will encourage participation by low and moderate-income persons, particularly those living in slum and blighted areas of Lowell, as defined by HUD, and in areas where CDBG funds are proposed to be used. Although a majority of residents throughout the City of Lowell are classified as low or moderate income by the Department of Housing and Urban Development as of the 2000 Census, particular efforts will be made to encourage participation by residents of predominantly low and moderate income neighborhoods, which currently include the following census tracts:

Neighborhood	Census Tract
Acre	3107, 3108, 3110, 3111
Back Central	3119, 3120, 3121
Downtown Lowell	3101
Centralville	3102, 3103, 3104
Highlands	3113, 3114*, 3115*, 3116*
Lower Highlands	3112, 3117, 3118
Lower Belvidere	3124
Pawtucketville	3105, 3106.01*, 3106.02*
South Lowell	3122, 3123*

*(*indicates that only selected block groups in these tracts are classified as having low and moderate income persons, based upon the 2000 Census data.)*

In addition it is expected the City will take steps to encourage the participation of all its citizens, including minorities and non-English speaking persons, as well as persons with disabilities. The City will provide translation services for any public meeting or public hearing, if the request for such services is requested four days in advance of the meeting. In addition, all meetings will be conducted in areas that are accessible to persons with disabilities. The City will also partner with the Lowell Association for the Blind, Inc. to make accommodations for individuals with impairments.

The City will encourage the Lowell Housing Authority (LHA) and its tenants to participate in the process of developing and implementing the City's Consolidated Plan and annual Action Plan, along with other low income residents of targeted revitalization areas in which the developments are located. The City shall provide information to the LHA about the consolidated plan activities related to its developments so that the LHA can make this information available at their annual public hearing.

CITIZEN ADVISORY COMMITTEES

Committee Composition

The City Manager shall appoint a Citizen Advisory Committee (CAC) for the Lowell Consolidated Plan development process, consisting of at least seven (7), but not more than nine (9) members. All CAC members must be Lowell residents. The majority of the CAC members shall be low and moderate-income persons, and/or residents of blighted or potentially blighted areas, and/or residents of low and moderate-income neighborhoods.

The City Manager shall initially appoint one third of the Members for a three (3) year term; one third of the Members for a two (2) year term; and the remaining Members for a one (1) year term. Upon expiration of the initial term, each subsequent appointment or re-appointment will be for a three (3) year term. The Committee will elect a Chairperson, and a Vice-Chairperson from their membership to conduct Committee business under *Robert's Rules of Order*.

A Housing Opportunities for Persons with AIDS (HOPWA) Advisory Committee shall also be formed with a minimum of five (5) and a maximum of nine (9) members. All members must be residents of Middlesex County, Massachusetts. At least three (3) members shall be appointed by the Lowell City Manager. One member shall be

appointed by the Cambridge City Manager and one member shall be appointed by the Framingham Town Manager.

The Lowell City Manager shall initially appoint one third of the Members for a three (3) year term; one third of the Members for a two (2) year term; and the remaining Members for a one (1) year term. Appointments from Cambridge and Framingham shall be for three (3) year terms. Upon expiration of the initial term, each subsequent appointment or re-appointment will be for a three (3) year term. The Committee will elect a Chairperson, and a Vice-Chairperson from their membership to conduct Committee business under *Robert's Rules of Order*.

Committee Duties and Responsibilities

The CAC shall act in an advisory capacity to the City Manager and shall conduct Public Hearings, Public Meetings, solicit proposals, review all evidence, testimony, and proposals given at the hearings, meetings, or through other methods of communication to formulate and recommend to the City Manager, a spending plan for all discretionary Community Development Block Grant Program (CDBG), and Emergency Shelter Grant Program (ESG) funds available each program year under the City's Annual Action Plan.

Funding under these programs that is designated for specific purposes (including multi-year commitments, municipal public facilities projects, and specific targeted areas) in the five-year Consolidated Plan has been reviewed by the CAC as part of the development of this five-year plan, but will not be revisited by the CAC on an annual basis.

The HOPWA Advisory Committee shall act in an advisory capacity to the City Manager and shall conduct Public Hearings, Public Meetings, solicit proposals, review all evidence, testimony, and proposals given at the hearings, meetings, or through other methods of communication to formulate and recommend to the City Manager, a spending plan for all discretionary HOPWA funds available each program year under the City's Annual Action Plan.

CITIZEN PARTICIPATION PLAN REQUIREMENTS

Citizen Input

The City, on an annual basis, through its Citizen Advisory Committee, will make available to citizens, public agencies, and other interested parties, information that includes the amount of assistance the City expects to receive, including specific grant funds, available unspent prior years funds, and related program income. The City will also disclose the range of activities that may be undertaken including the estimated amount that will benefit persons of low and moderate income.

The City will make available to citizens, public agencies, and other interested parties, on an annual basis, the following information through the indicated means:

<u>Information</u>	<u>Source</u>
Amount of assistance	Written notice, public hearing
Range of activities	Written notice, public hearing
Amount to benefit L/M	Written notice, public hearing
Displacement	Public hearing

City's Notification Requirement Regarding Draft Plan Availability

A notification will be advertised a minimum of two (2) times in a local newspaper of general circulation to inform the public that a draft Consolidated Plan, or draft annual Action Plan is available to examine and subject to public comment. The notification will provide a summary of the proposed Consolidated Plan, or annual Action Plan, and describe the contents and purpose of the particular plan. The notice will also be posted on the City's home page (www.lowellma.gov) and on bulletin boards at the locations below. The public notice will state that copies of the particular Plan will be available for review on the City's website and at the following locations for thirty days:

Division of Planning and Development
JFK Civic Center, 2nd Floor
50 Arcand Drive
Lowell, MA 01852

Pollard Memorial Library
385 Merrimack Street
Lowell, MA 01852

Office of the City Clerk
City Hall
375 Merrimack Street
Lowell, MA 01852

Citizen Response Time Frame

The City will make the Plan public, and upon request in a format accessible to persons with disabilities. The City will provide the citizens a reasonable opportunity to comment on the Plan, and on any amendments to the Plan as defined by this Citizen Participation Plan.

The City will consider any comments or views of citizens received in writing, or orally, at any of the public hearings, or during the 30-day public review and will address those comments in the preparation of the final consolidated plan or annual action plan. The City will include any written or oral comments in the final Consolidated Plan or Annual Action Plan submitted to HUD.

The City will also make copies of the draft plan, and Final Plan available to the general public, on the City's website (www.lowellma.gov). Hard copies will also be available at the Pollard Library, City Clerk office, and at the Division of Planning and Development upon request. A draft plan will also be given to the Public Housing Authority for comment. The Consolidated Plan that covered the preceding five years will also be available on the City's website.

AMENDMENTS

The City will amend its approved plan whenever it makes one of the following decisions:

1. To make a change in the goal, priority, or activity of the Consolidated Plan; or

2. To carry out an activity, using funds from any program covered by the Consolidated Plan (including program income), not previously covered in the Action Plan; or
3. To change the purpose, scope, location, or beneficiaries of an activity included in the annual action plan.

Each amendment must be authorized by the City Manager or his designee, and submitted to HUD. All amendments will also be made public by posting at the City Clerk's Office, the DPD, and on the City of Lowell's website (www.lowellma.gov). Amendments involving at least \$25,000 will also be advertised in the local newspaper. The amendment may be implemented immediately after making it public. A list of amendments will be submitted to HUD each quarter.

A **substantial amendment** to the Consolidated Plan or annual Action Plan is defined by the City as a transfer between two or more Plan activities that is greater than 50% of the ESG program funds, 30% of the HOME program funds, and 20% of the CDBG program funds.

Substantial amendments to the Plan will need to be presented to the Citizen Advisory Committee and the Lowell City Council for their review and approval. The public will also be notified by advertising the amendment in the local newspaper. The advertising of the substantial amendment will begin a thirty (30) day citizen review and comment period. The City will consider any comments or views of citizens received in writing or orally during the comment period, and will be submitted to HUD, and made available at the Pollard Library, City Clerk's Office, and the DPD. The City Manager will submit to HUD, a letter authorizing the amendment after the thirty-day comment period, and will implement the amendment at that time.

PERFORMANCE REPORT

At the end of each program year, as required by HUD, a Comprehensive Annual Performance and Evaluation Report (CAPER) must be submitted to HUD by September 30th. The CAPER gives an actual account of activities, which occurred during the previous program year, and how the City maintained and expended funds, which were outlined in the annual Action Plan for that program year.

Upon completion of the CAPER, and at least fifteen (15) days prior to its submission to HUD, the City will make the Report available to the general public for a fifteen (15) day review and comment period. Any comments received from the general public will be included in CAPER submitted to HUD.

The City will provide a notice in the local newspaper for the availability of the CAPER, which will begin a fifteen-day review and comment period. A public notice will be advertised at least one week in advance, and published on two occasions prior to the review period. The notice and the draft CAPER will also be made available to the public via the City's website (www.lowellma.gov).

PUBLIC HEARING REQUIREMENTS

The City, with its Citizen Advisory Committees, will provide at least two (2) public hearings during the fiscal year to obtain citizens' views and to respond to proposals

and questions related to the CDBG, HOME, and ESG programs. The first hearing will also provide a forum for discussion and questions related to the HOPWA program.

The first hearing will be held at the beginning of the development process for the Annual Action Plan, and will be conducted early in the calendar year, at approximately the time HUD announces the annual entitlement amount for the CDBG, HOME, ESG, and HOPWA programs to the City. The goal of this hearing will be to review the City's most recent CAPER report and obtain views from citizens on housing and community development needs and activities, including priorities for non-housing community development needs. The citizen input during this meeting will directly shape the needs and priorities to be addressed by the spending plan in the Consolidated Annual Action Plan for the program year beginning July 1st of that year.

The second hearing will be held when the Draft Annual Action Plan has been completed and has been advertised as available for the required 30-day public review and comment period.

All public hearings will be advertised by publication at least twice prior to the hearing date in a newspaper of general circulation throughout the area(s) eligible to receive funds under the programs advertised. The first notice must be published no later than two weeks prior to the hearing date. All public hearing notices will also be posted on the City of Lowell's website (www.lowellma.gov), and at the City Clerk's Office at least two weeks prior to the hearing date. The City will consider any comments or views of citizens received in writing or orally at a public hearing. Each hearing will be held in the evening at facilities that are handicapped accessible. (Locations may include the Lowell Senior Center, the Lowell Housing Authority's Armand P. Mercier Community Center, and the Pollard Memorial Library. All of these locations are convenient to potential and actual beneficiaries, and will accommodate persons with disabilities.)

Each public hearing notice must include the availability of an interpreter if a significant number of non-English speaking or hearing-impaired persons are expected to participate at the hearing. Public hearing notices will be translated into Spanish, Khmer, and Portuguese. It will be the responsibility of the residents to notify the City at least four days in advance of the hearing if interpreter services are needed. Each public hearing notice will indicate this policy and provide a telephone number to contact the City.

In the course of developing their recommendation for a spending plan for the Annual Action Plan, the Citizen Advisory Committees may hold a series of additional public meetings to both provide information on the solicitation of proposals and the review of all proposals for consideration for funding. All public meetings of this nature will be advertised in accordance with the applicable provisions of the Massachusetts Open Meeting Law (Mass. General Law c. 34B, § 1), including postings of public notice of the meeting.

ACCESS TO RECORDS

The City will provide citizens, public agencies and other interested parties (including persons with disabilities) access to information and records relating to the City's Consolidated Plan and the City's use of funds for the CDBG, HOME, and ESG funds

for the preceding five years. Citizens must allow the staff of DPD up to twelve working days to compile and provide the information requested by the citizen.

TECHNICAL ASSISTANCE

The DPD will provide technical assistance to the Citizens Advisory Committee and groups representative of persons of low and moderate income that request such assistance in developing proposals for funding assistance under any of the federal or state programs covered by the Consolidated Plan. The level and type of assistance will be determined by the DPD, but shall not include the provision of funds to any person, group, or agency.

COMPLAINTS

Citizens with complaints related to the Consolidated Plan, amendments, and the annual performance report must submit the complaint in writing to:

Division of Planning and Development
JFK Civic Center
50 Arcand Drive
Lowell, Massachusetts 01852
Attention: Director

If the complaint is given orally, the person initiating the complaint must schedule a meeting with the Director at the above-mentioned address and a formal complaint letter will be transcribed. The person must sign the letter and submit an address for response.

Upon receipt of the written complaint, the DPD will respond to the complaint in writing within fifteen working days. A meeting to discuss the complaint must be scheduled by the person initiating the complaint.

USE OF THE CITIZEN PARTICIPATION PLAN

The requirements for citizen participation do not restrict the responsibility or authority of the jurisdiction in the development and execution of the City's Consolidated Plan.

ANTI-DISPLACEMENT AND RELOCATION PLAN

The City of Lowell has as a goal, the non-displacement of any person(s) currently residing in standard housing (housing that does or will meet the HUD Housing Quality Standards with minimal improvements). However, the City also has a goal to not allow any person(s) to reside in dangerous and/or substandard housing. When the health and safety of any person is threatened due to the condition of their current housing, the City, when notified of the condition, will attempt to assist the property owner in bringing the housing up to Housing Quality Standards, remove such substandard housing, or recommend temporary or permanent displacement of the person(s) residing therein.

Under the ***Optional Relocation Assistance Policy and Program for the CDBG Program*** which was established in December 1997, the City will provide, if funds are available, relocation assistance, relocation payments, and rental assistance payments to any person(s) who is displaced, permanently and involuntarily, from

any existing housing unit as a direct result of the enforcement of Article II of the Massachusetts State Sanitary Code.

If the City provides, or proposes to provide, any CDBG, HOME, or other HUD-funded assistance to acquire, demolish, bring any existing housing units up to the minimum local health and building code requirements, or any action results in the direct permanent displacement of any legal resident(s), it will comply with the procedures, and provide the benefits, outlined in the ***Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. 4601), as amended***; the implementing regulations issued by the Department of Transportation at 49 CFR 24; and ***Section 104(d) of the Housing and Community Development Act of 1974 [42 U.S.C. 5304(d)]***.

Prior to any action that will result in the displacement of any existing resident(s) of existing housing unit(s), the City will notify all affected residents of the intended displacement action, and the extent of the benefits that will be available to each impacted person as outlined in 42 U.S.C. 4601 and 5304(d), and 49 CFR 24.

2. COMMENTS RECEIVED

Testimony from Public Hearing April 1, 2010

Mark Goldman, Lowell Resident

Mr. Goldman expressed support in general for the overall proposed allocation of funds in both the 5 Year and Annual Plans.

Troix Bettencourt, Institute for Health and Recovery & Rape Crisis Services

Mr. Bettencourt noted the absence of some organizations that provide services to individuals with HIV/AIDS in the planning of the 5-Year Consolidated Plan and offered to provide contact information at agencies he thought may have comments on the draft plan. Mr. Bettencourt also asked about how the City may be able to provide HIV/AIDS service providers opportunities to meet and discuss challenges and successes with managing their programs.

City of Lowell Response

The City advertises the opportunity to help plan for the development of both the Consolidated Plan and Annual Action Plan on the City's website, in the Lowell Sun, the Boston Globe, as well as in posted notices and direct emails to more than a hundred local social service agencies. The City recognizes that despite these efforts there may still be organizations that are not aware of Lowell's entitlement grants or opportunities to participate in these federal programs. Mr. Bettencourt provided the City with a list of contacts at some organizations which were not listed in the draft Plans. Separate notifications were sent to these organizations during the comment period to allow them an opportunity to provide feedback on the proposed spending plans and plan development process. In addition staff at the Division of Planning and Development are considering ways to help facilitate meetings with HIV/AIDS service providers including peer-to-peer meetings and technical assistance trainings.

Written Comments Received

The following written comments were submitted during the public comment period.



VICTORY
PROGRAMS

opening doors to recovery and hope

AIDS Housing -
Technical Assistance
Bobbie White Housing Services
Cedar Family House
Health, Wellness and
Education Initiative
Joelyn's Family Home
Living and Recovering
Community (LARC)
New Victories
Portis Family House
ReVision Family House
ReVision Urban Farm
Shepherd House
Victory House
Victory Housing on Warren St.
Victory Transitional House
Women's Hope
Women's Hope
Transitional House

965 Massachusetts Avenue
Boston, MA 02118

Tel: 617.541.0222
Fax: 617.541.0094
Website: www.vpi.org

March 30, 2010

The City of Lowell
Division of Planning and Development
50 Arcand Drive
Lowell, MA 01852

**RE: Draft 2010-2015 Consolidated Plan
Draft 2010-2011 Action Plan**

To Whom It May Concern:

Victory Programs, Inc. is pleased to submit the following comments on the City of Lowell's draft Consolidated Plan and draft Action Plan as referenced above, with particular attention to their HIV/AIDS housing components.

Victory Programs, established in 1975, provides residential substance use disorder treatment, transitional and permanent housing in programs throughout the Boston area. Victory Programs' affiliation with the City of Lowell has become more direct through two recent program mergers:

- In July of 2009 the AIDS Housing Corporation merged to become Victory Programs' Technical Assistance Program (TAP). AIDS Housing Corporation has worked with the City of Lowell for many years by providing HOPWA technical assistance services including the completion of your HIV/AIDS housing needs assessments. The TAP continues to be available to provide HOPWA technical assistance as needed.
- More recently Victory Programs acquired Ruah House, supported by City of Lowell HOPWA funding and formerly operated by Cambridge Cares About AIDS. Victory Programs has assumed ownership of the property and all roles and responsibilities around the operation of the program. The ongoing support of Ruah House with City of Lowell HOPWA funding will allow the program to continue its mission of serving homeless women with HIV/AIDS.

In addition, Victory Programs is now providing housing stabilization services to homeless families being placed into permanent housing from motel/hotel shelters throughout the region. These services are supported by funds from the Homelessness Prevention/Rapid Re-housing Program (HPRP) allocated by the State of Massachusetts.



This agency is supported by
United Way
of Massachusetts Bay

March 30, 2010
The City of Lowell
Page 2

Overall we are very pleased with the draft plans and their approach to addressing affordable and supportive housing and homelessness throughout your funded region. We are particularly pleased with your commitment to HIV/AIDS housing and your ongoing support of the programs that serve people with HIV/AIDS in the region, including Ruah House. For most people living with HIV/AIDS who are in need of housing assistance, rental assistance programs like the one you support with your HOPWA dollars, play a critical role in getting people situated into housing and preventing homelessness. Supportive services aimed at stabilizing people living with HIV/AIDS once they are placed are also critical and we commend your ongoing funding of the services provided by Cambridge Cares About AIDS, JRI Health and the AIDS Action Committee.

The continued support of the HOPWA Advisory Committee plays an important role in ensuring that HOPWA funding is most effectively addressing HIV/AIDS housing needs in the region. We would urge you to continue to carefully monitor the composition of this Advisory Committee to be sure that it includes providers of HIV/AIDS housing and services as well as individuals living with HIV/AIDS from the community.

We were also pleased to see that you are planning to set aside some of your HOPWA formula grant to create an "innovation fund" that encourages new ideas in responding to HIV/AIDS housing needs. As HIV/AIDS housing needs are ever-changing this new fund will provide an opportunity for area providers to respond creatively. However, in the event that these funds are not awarded to any entity within a reasonable time frame we urge you to disperse them annually to the existing HIV/AIDS housing programs you support in order to further bolster their efforts.

Again, both plans outline a response that can effectively address homelessness in the Lowell region and place a high priority on special needs populations such as those living with HIV/AIDS. Victory Programs looks forward to expanding upon our affiliation with the City of Lowell and your efforts to ensure access to supportive housing services and safe places to live for all those in need.

Please feel free to contact our Director of Community Affairs, Joe Carleo, at 617-927-0088, x31 with any questions or if we can be of any assistance. Thank you for the opportunity to submit these comments.

Sincerely,



Jonathan D. Scott
President and CEO
Victory Programs, Inc.

3. EFFORTS TO BROADEN PARTICIPATION

The components of the citizen participation plan discussed above have been designed with the explicit intention of accommodating and encouraging participation by low- and moderate-income residents, residents of low- and moderate-income neighborhoods, members of minority groups, persons with limited English skills, and persons with disabilities.

In addition to these efforts, as was discussed above, the City of Lowell completed and adopted a twenty-year Master Plan. That plan was guided in large part by the results of an extensive public opinion research process. This process included a 1001 household telephone survey conducted in five languages (Spanish, Khmer, Portuguese, and Brazilian Portuguese in addition to English) with careful scientific sampling techniques used to ensure proportional representation among various minority, geographic, age, and income groupings. Survey respondents included 273 households earning below \$30,000 annually and 233 households earning between \$30,000 and \$49,999 annually. The Master Plan outreach effort also included an extensive telephone survey of businesses, several resident focus groups, and interviews with 60 community leaders, all of which included proportional participation by minority and low-income residents.

In the development of this Consolidated Plan the City released an on-line survey using similar questions as were used in the 2003 Master Plan. The availability of the survey was announced on the City's website as well as via email to more than 100 social service agencies, the Lowell Housing Authority, and neighborhood groups. Residents without internet access were encouraged to utilize computers at the Pollard Memorial Library or the Lowell Senior Center. Hard copies of the survey were also made available at the Lowell Senior Center, Lowell Community Health Center, Community Teamwork, Inc., and several other public service organizations. In all, more than 500 residents responded to the survey. The survey results played an important role in the development of this Consolidated Plan.

Finally, plan development included targeted outreach to service providers, sub-recipients, and their clients involved in the delivery of eligible program activities to eligible populations as well as numerous neighborhood groups and small business owners. These consultations necessarily involved the active participation of members of minority groups, low and moderate-income individuals, persons with limited English skills, and individuals with disabilities.

4. COMMENTS NOT ACCEPTED

All comments formally submitted have been included with responses in the Comments section above.

Institutional Structure (91.215 (i))

1. Explain the institutional structure through which the jurisdiction will carry out its consolidated plan, including private industry, non-profit organizations, and public institutions.
2. Assess the strengths and gaps in the delivery system.
3. Assess the strengths and gaps in the delivery system for public housing, including a description of the organizational relationship between the jurisdiction and the public housing agency, including the appointing authority for the commissioners or board of housing agency, relationship regarding hiring, contracting and procurement; provision of services funded by the jurisdiction; review by the jurisdiction of proposed capital improvements as well as proposed development, demolition or disposition of public housing developments.

3-5 Year Strategic Plan Institutional Structure response:

1. INSTITUTIONAL STRUCTURE

The City of Lowell Division of Planning and Development (DPD) is the lead administrative agency for the Consolidated Plan programs. The DPD provides fiscal and regulatory oversight of all CDBG, HOME, ESG, HOPWA, and McKinney funding sources as well as other Federal and State grants for housing, economic, and community development.

The Lowell City Council acts as the final authority for the appropriation of funds for Annual Action Plan activities under the Consolidated Plan grant programs, following the recommendations of the Citizens Advisory Committee and the City Manager.

Within each of the priority funding areas, activities will be completed and managed by a diverse team of public, private, not-for-profit, and institutional partners. The lists below identify some of the principal partners for each priority funding area. While not all the organizations list below may receive Consolidated Plan funds directly, they are key partners in programs that support Consolidated Plan goals.

Homeless/HIV/AIDS

AIDS Action Committee	Lowell Continuum of Care
AIDS Housing Corporation	Lowell House, Inc,
Alternative House	Lowell Housing Authority
Bedford Veterans Affairs Office	Lowell Transitional Living Center, Inc.
Cambridge Cares About AIDS	Mass. Alliance of Portuguese Speakers
City of Lowell DPD	Mass. Department of Public Health
City of Lowell Health Department	Mental Health Assoc of Greater Lowell
City of Lowell Hunger/Homeless Commission	Metropolitan Boston Housing Partnership
Community Teamwork, Inc	Merrimack Valley Catholic Charities
Greater Lowell Interfaith Alliance	Pathfinder
House of Hope Inc.	SHIFT Coalition
Institute for Health and Recovery	Southern Middlesex Opportunity Council
Justice Resource Institute	Tri-City Community Action Program

Latin American Health Institute
Lowell Community Health Center

Victory Programs

Non-Homeless Special Needs

Asian Task Force Against Domestic Violence	Lowell Housing Authority
Cambodian Mutual Assistance Association	Lowell Telecommunications Corporation
Central Food Ministry, Inc.	Lowell Transitional Living Center, Inc.
City of Lowell Council on Aging	Mass Alliance of Portuguese Speakers
City of Lowell Hunger/Homeless Commission	Mental Health Assoc of Greater Lowell
Community Family, Inc.	Merrimack Valley Catholic Charities
Community Teamwork, Inc	Merrimack Valley Food Bank, Inc.
Greater Lowell Interfaith Leadership Alliance	Open Pantry of Greater Lowell Inc.
LifeLinks	Rape Crisis Services of Greater Lowell
Lowell Association for the Blind, Inc	Rebuilding Together, Lowell
Lowell Community Health Center	Retarded Adult Rehab Association

Rental Housing

City of Lowell. DPD	Lowell Housing Authority
Coalition for a Better Acre	Lowell Transitional Living Center, Inc.
Community Teamwork, Inc	Pathfinder/Bridgewell
House of Hope Inc	Residents First Development Corporation

Owner-Occupied Housing

City of Lowell DPD	Habitat for Humanity of Greater Lowell
Coalition for a Better Acre	Lowell Development and Finance Corporation
Community Teamwork, Inc	Merrimack Valley Housing Partnership
Common Ground	Residents First Development Corporation

Public Facilities

City of Lowell Council on Aging	City of Lowell Dept. of Parks and Recreation
City of Lowell DPD	City of Lowell Police Department
City of Lowell Fire Department	City of Lowell Department of Public Works
City of Lowell Health Department	City of Lowell Wastewater Utility
City of Lowell Information Technology Department	City of Lowell Water Utility
City of Lowell Division of Neighborhood Services	Middlesex Community College
City of Lowell Parking Department	Neighborhood Associations
	University of Massachusetts Lowell

Infrastructure

City of Lowell DPD	City of Lowell Police Department
City of Lowell Fire Department	City of Lowell Department of Public Works
City of Lowell Information Technology Department	City of Lowell Wastewater Utility
City of Lowell Parking Department	City of Lowell Water Utility
City of Lowell Dept. of Parks and Recreation	Lowell Telecommunications Corporation

Economic Development

Acre Family Day Care Center	Cultural Organization of Lowell
Cambodian Mutual Assistance Association	Lowell Development and Finance Corporation
City of Lowell DPD	Lowell Historic Board
City of Lowell Parking Department	The Lowell Plan
City of Lowell Department of Public Works	Lowell Small Business Assistance Center
Coalition for a Better Acre	Middlesex Community College
Community Teamwork, Inc.	University of Massachusetts Lowell

Public Services

Acre Family Day Care Center	Lowell Telecommunications Corporation
Angkor Dance troupe	Lowell Transitional Living Center, Inc.
Asian Task Force Against Domestic Violence	Mass Alliance of Portuguese Speakers
Big Brother/Big Sister	Mental Health Assoc of Greater Lowell
Boys & Girls Club of Greater Lowell, Inc.	Merrimack Valley Catholic Charities
Cambodian Mutual Assistance Association	Merrimack Valley Food Bank, Inc.
Central Food Ministry, Inc.	Open Pantry of Greater Lowell Inc.
City of Lowell Council on Aging	Rape Crisis Services of Greater Lowell
City of Lowell Hunger/Homeless Commission	Rebuilding Together
Coalition for a Better Acre	Retarded Adult Rehabilitative Assoc.
Community Teamwork, Inc	Spindle City Corps
Concord Family & Youth Services	Suitability
Girls, Inc.	The Community Family, Inc.
House of Hope Inc.	United Teen Equality Center (UTEC)
LifeLinks	West End GYM Inc.
Lowell Association for the Blind, Inc	YMCA
Lowell Community Health Center	YWCA

2. CONSOLIDATED PLAN DELIVERY SYSTEM

Lowell is a City that prides itself on a decades-long track record of successful partnerships among public and private sector entities. The delivery system for the Consolidated Plan programs is no exception. Communication and cooperation between the City of Lowell Division of Planning and Development (DPD) and the partner agencies and organizations that administer activities is strong.

In past years, DPD staff have worked closely with the other organizations involved in the Consolidated Plan programs to improve regulatory compliance, monitoring, cooperation and partnerships among agencies, and technical capacity of organizations involved in project delivery.

The single most significant impediment that remains in the delivery system remains the lack of available funding to support community development, economic development, and affordable housing projects. State funding has been drastically reduced by several years of fiscal challenges for the Commonwealth of

Massachusetts; private sources have been reduced as foundation endowments and corporate profits have shrunk in recent years; and City funds are extremely limited as the City government attempts to compensate for significant reductions in local aid from the state government. Finally, as the City's entitlement grants continue to shrink every year, despite increases in the cost of service delivery, it becomes more and more difficult to maintain existing levels of activity, nearly impossible to effectively expand services, and challenging to address major new initiatives. The lack of sufficient funding is particularly acute in terms of housing production as Eastern Massachusetts continues to lead the nation in the cost of housing.

Other potential gaps in the delivery system include the duplication of services among multiple not-for-profit agencies providing public services and the comparatively small number of experienced community development corporations involved in the production of affordable housing and public facilities for a city the size of Lowell. The DPD is attempting to address these gaps in the coming years by strongly encouraging partnerships among public service providers and by aggressively promoting the creation and designation of Community Housing Development Organizations and providing support and training to help these groups become more established and successful.

3. PUBLIC HOUSING DELIVERY SYSTEM

The Lowell Housing Authority is a public body consisting of a five member Board of Commissioners. Organizationally, the Authority is separate and distinct from the City of Lowell in that it does not fall within the City's existing governmental structure.

However, the City of Lowell does maintain a degree of control in the form of appointments to the Lowell Housing Authority's Board of Commissioners. The City of Lowell, acting by and through the City Manager with confirmation from the Lowell City Council, appoints four of the Authority's five Board members. The Governor of the Commonwealth of Massachusetts makes the fifth appointment.

In terms of relationships regarding hiring, contracting and procurement, the Lowell Housing Authority undertakes and completes the aforementioned items through its Executive Director and administrative staff, independently of the City of Lowell. Nonetheless, the LHA must adhere to hiring practices required by the federal Department of Housing and Urban Development and the Massachusetts Department of Housing and Community Development. Contracting and procurement activities are governed by Massachusetts General Law. Applicable statutes include Chapters 149A and 30B.

Residents of public and assisted housing are entitled to the use and benefit of services provided and funded by the City of Lowell in much the same way as all residents of the City of Lowell are entitled to the use and benefit of City of Lowell services. Additionally, the Lowell Housing Authority applies to the City of Lowell for funding provided by the City's Community Development Block Grant and HOME Program funds. LHA residents are entitled to benefit from services and activities funded through CDBG and HOME Program funds.

The City of Lowell has some input in the review of procedures for proposed sites for development of public or assisted housing. Specifically, in order to implement a plan which proposes to develop additional public or assisted housing, the LHA must amend the Corporation Agreement currently existing between the City of Lowell and

the LHA. This requires a vote of the Lowell City Council. Major development proposals are also subject to the applicable review by City of Lowell Boards and Commissions, including the Planning Board, Conservation Commission, and Zoning Board of Appeals, under the Code of Ordinances of the City of Lowell and Massachusetts General Laws.

As part of the Quality Housing and Work Responsibility Act of 1998, all housing authorities are required to develop a Comprehensive Five Year Plan and submit it to HUD for approval. Said Plan must be approved by the City of Lowell prior to submission to HUD. Therefore, the City of Lowell does have a built in mechanism for review of the Lowell Housing Authority's planned activities over a five-year period. The content of the LHA's five-year plan is coordinated with the content of this Consolidated Plan.

In terms of proposed demolition and/or disposition of LHA owned public housing, HUD requires that, prior to demolition/disposition, the City of Lowell must approve in writing said demolition/disposition. Consequently, the City of Lowell has a built in review and approval process for proposed LHA demolition/disposition activities.

Monitoring (91.230)

1. Describe the standards and procedures the jurisdiction will use to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

3-5 Year Strategic Plan Monitoring response:

1. MONITORING

The City of Lowell recognizes that monitoring is an important and ongoing component of the CDBG, HOME, HOPWA, and ESG programs. In order for the City to monitor itself, the Division of Planning and Development (DPD), the agency charged with administering and implementing the Annual Action Plan, has developed an internal management plan to assure the proper and timely implementation of the strategic plan and the annual plan. Procedures have been put in place to assure proper compliance with all program requirements for the CDBG, HOME, HOPWA, and ESG entitlements.

DPD project managers will be responsible for monitoring their assigned projects and activities. Priority will be given to new CDBG, HOME, HOPWA and ESG-funded projects or organizations. Monthly “desk audits” of the programs allow project managers a chance to track the timeliness of expenditures. On-site monitoring provides an opportunity for DPD staff members to ensure sub-recipients are in compliance with Federal regulations and are actively working to achieve the objectives outlined in their grant agreement and Annual Action Plan. Site visits also allow sub-recipients to receive technical assistance and provide feedback about program administration.

DPD’s strives to visit every sub-recipient each year, however due to the volume of programs funded in some years, this is not always possible. Therefore, by carefully examining sub-recipients’ performance through monthly desk audits, the Division of Planning and Development (DPD) can conduct a risk assessment to identify which sub-recipients require a more comprehensive monitoring. High-risk sub-recipients might include:

- Sub-Recipients new to the CDBG, HOME, ESG, or HOPWA programs;
- Sub-Recipients that have experienced turnover in key staff positions or a change in goals or direction.
- Sub-Recipients with previous compliance or performance problems including failure to meet schedules, submit timely reports, or clear monitoring or audit findings.
- Sub-Recipients carrying out high-risk activities (such as economic development); and
- Sub-Recipients undertaking multiple CDBG, HOME, ESG, or HOPWA-funded activities for the first time.

A monitoring schedule will be prepared based on this risk assessment. In any event, the City is committed to visiting each program funded with Consolidated Plan funds at least once during the five-year period. First, the assigned monitor will contact the agency to explain the purpose of monitoring and schedules a date and time for the on-site visit. Once this is completed, a confirmation letter is sent before the

scheduled visit to confirm all aspects of the monitoring and to explain what can be expected.

In preparation for the monitoring visit, the monitor will review all written data on file for the sub-recipient, such as application for CDBG funding, written agreement and amendments, monthly reporting requirements, documentation of previous monitoring, and copies of audits.

During the actual visit, a thorough review of the sub-recipient's files ensures they comply with all regulations governing their administrative, financial and programmatic operations and that they are achieving their performance objectives within schedule and budget. A clear written record of the on-site visit is kept by using one or more of the City of Lowell's monitoring checklists. The assigned monitor will fill out the form during the visit.

At the end of the visit, the monitor concludes the visit by reviewing the tentative conclusions from the monitoring. At this point, there will be a clear understanding between the monitor and sub-recipient of the areas of disagreement and agreement regarding the monitoring results.

Once the on-site visit is completed, the monitor prepares a formal written letter describing the results of the visit, providing recognition of the sub-recipient's strengths and weaknesses. A copy of this letter will be kept on file with the sub-recipient's grant agreement and monthly reports.

If the sub-recipient is experiencing problems or is failing to comply with regulations, these issues will be specifically outlined in the monitoring follow-up letter, along with recommendations or requirements to address and rectify the problems. If a concern or **finding** is issued for noncompliance with Federal rules and regulations, the monitoring follow-up letter will provide recommendations on how the situation can be remedied, but no additional action is required. When a **finding** is issued, the monitoring follow-up letter will identify a deadline for when the specific issues must be corrected. The monitor will then follow-up with the organization to make sure the corrections have been made.

For situations in which the recommended corrections have not been made, the organization will be placed on a probationary period, which must be approved by the Assistant City Manager/DPD Director, until the issues have been rectified and the sub-recipient is once again in compliance with Federal regulations and the grant agreement.

Priority Needs Analysis and Strategies (91.215 (a))

1. Describe the basis for assigning the priority given to each category of priority needs.
2. Identify any obstacles to meeting underserved needs.

3-5 Year Strategic Plan Priority Needs Analysis and Strategies response:

1. PRIORITY NEEDS ANALYSIS

Please see General Questions responses, above.

Lead-based Paint (91.215 (g))

1. Estimate the number of housing units that contain lead-based paint hazards, as defined in section 1004 of the Residential Lead-Based Paint Hazard Reduction Act of 1992, and are occupied by extremely low-income, low-income, and moderate-income families.
2. Outline actions proposed or being taken to evaluate and reduce lead-based paint hazards and describe how lead based paint hazards will be integrated into housing policies and programs, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

3-5 Year Strategic Plan Lead-based Paint response:

1. PREVALENCE OF LEAD-BASED PAINT HAZARDS

ESTIMATED PREVALENCE OF LEAD-BASED PAINT HAZARDS

All housing units built before 1980 are counted herein as being likely to have lead-based paint hazards. 1978 was the first year that Federal law prohibited the use of lead-based paint in residential property. Housing age information is available in increments of 10 year time periods. As not all supplies of lead-based paint were used up immediately after the enactment of this law, there will be instances wherein paint with lead was used in properties built soon after the passage of the law. Thus, to be conservative and not to leave out potentially hazardous housing units, housing units built through 1980 are included in this estimate.

In the City of Lowell, the vast majority of housing units (85%) were built before 1980. These total approximately 32, 191 units out of 37,887. The City of Lowell continues to be one of 20 communities in the Commonwealth designated as a high risk community. According to the Massachusetts Childhood Lead Poisoning Prevention Program a high risk community is where blood lead levels ≥ 20 mcg/dl incident rate per 1000 children screened per year is above the overall state rate.

Lowell Housing Stock by Age and Tenancy

Age	Renter		Owner		Total units
Built 1980 and up	3,183	8.4%	2,513	6.6	5,696
Built 1970 to 1979	2,624	6.9%	900	2.4	3,524
Built 1960 to 1969	2,368	6.3%	1,804	4.8	4,172
Built 1950 to 1959	2,163	5.7%	1,720	4.5	3,883
Built 1940 to 1949	2,030	5.4%	1,129	3.0	3,159
Built 1939 or earlier	9,189	24.3%	8,264	21.8	17,453
TOTAL	21,557	56.9%	16,330	43.1%	37,887

Source: US Census 2000

PREVALENCE AMONG EXTREMELY-LOW, LOW, AND MODERATE-INCOME FAMILIES

Based on the 2000 U.S. Census, 57.81 percent of Lowell's residents are low and moderate income. If these extremely low- low- and moderate- income persons are aggregated into low- and moderate- income families, and if it is assumed that they occupy a percentage of the City's housing units proportional to their population, then as many as 57-58% of all the pre-1980 housing units could be reasoned to be occupied by low- and moderate- income families. This number may be even higher, since the low income population may be more likely to live in older housing than people with greater means. However, all units owned by the Lowell Housing Authority have been deleaded.

Estimated Lead Hazards in Low-income and moderate-income Housing

	Total Households	Lowell Housing Authority Units	Estimated Housing Units with Lead Hazards
Extremely Low-Income (<30% AMI)	8472	1650*	6200
Low-Income (30-50% AMI)	5593	240*	4800
Moderate Income (50-80% AMI)	6910	13*	6000
TOTAL	20975	1893	17000

*estimates

Source: CHAS Data, LHA, US Census

The City of Lowell estimates the number of housing units housing low-income and moderate-income families that may have lead paint hazards present to be approximately 17,000.

Regardless of the precise numbers, Lowell has an aging housing stock and a sizable proportion of extremely low-, low-, and moderate- income individuals and families.

Although the Lowell Lead Program has made great strides since 1998, deleading approximately 820 units, it can be plainly seen that much more work needs to be done.

2. EVALUATION AND REDUCTION OF LEAD PAINT HAZARDS

DESCRIPTION OF THE LOWELL LEAD PROGRAM

Lowell has had a highly active program for the evaluation and reduction of lead paint hazards in residential properties since 1998. With grant funding from the HUD Office of Healthy Homes and Lead Hazard Control the Lowell Lead Program has been able to provide financial and technical assistance to low income homeowners and owners that rent to low-income tenants in order to achieve compliance with HUD requirements and the Massachusetts Lead Law. Housed in the Division of Planning and Development, the Lowell Lead Program is an integral part of the services offered in combination with the Housing Rehabilitation Program, the First Time Home Buyer Program and CDBG rehabilitation funds. The Lowell Lead Program is also supported by MassHousing "Get the Lead Out" loan and contributions from property owners receiving deleading assistance.

In order to preserve and encourage affordable housing in the City of Lowell, in exchange for grant funds, the Program requires a three year affordable housing deed

restriction for all investor units. The restriction encourages landlords to rent deleaded units to families with children under 6 years old and requires that units are offered at rents affordable to low and moderate income households.

Other key components of the Lowell Lead Program are public health education regarding lead poisoning prevention, outreach regarding the availability of funds, technical training and certification in lead related employment opportunities and free blood lead testing for low income families with children under 6 years old. The education and outreach components are essential to modify behaviors in a way that ultimately help reduce the incidence of childhood lead poisoning.

Partnerships with the following agencies have been established to successfully reach the Lowell Lead Program goals:

- Lowell Health Department
- Merrimack Valley Housing Partnership (MVHP)
- Community Teamwork Inc., YouthBuild Program
- Greater Lawrence Community Action Council (GLCAC)
- MassHousing Get the Lead Out Loan Program
- Lowell Five Cent Savings Bank
- Institute for Environmental Education

The Lowell Lead Program will continue, as funding levels allow, working with partners and the Massachusetts Childhood Lead Poisoning Prevention Program to identify lead based paint hazards and assist property owners to obtain compliance with the Mass Lead Law.

INTEGRATION OF LEAD BASED PAINT EVALUATION AND REDUCTION IN HOUSING POLICIES AND PROGRAMS

Within the City of Lowell, the LLP program works in concert with the City's Housing Rehabilitation Program so that all units in that program in need of de-leading receive it. All housing rehab applicants are first referred to the LLP for review of their lead hazard compliance status. The LLP will qualify applicants and make sure the lead paint requirements are addressed prior to other rehabilitation assistance. This assures compliance with Title X, Sections 1012 and 1013.

Prior to any deleading activities in a property, The Lowell Lead Program requests that a sanitary health and safety code inspection is performed by the City of Lowell Code Enforcement Division. In addition, each property is reviewed by the Lowell Historic Board in order to determine if there are specific requirements based on the age or location of the property.

The Section 8 Rental Assistance Programs operated by Community Teamwork, Inc. and the Lowell Housing Authority also rely on deleading assistance and resources offered by the Lowell Lead Program in order to assure that all units occupied by a child under 6 years old is in compliance with the Mass Lead Law.

The City's LLP program remains committed to its mission and will make every attempt to progress during the next five years in the Consolidated Plan period towards the goal of eliminating lead paint hazards in Lowell.

HOUSING

Housing Needs (91.205)

*Please also refer to the Housing Needs Table in the Needs.xls workbook

1. Describe the estimated housing needs projected for the next five year period for the following categories of persons: extremely low-income, low-income, moderate-income, and middle-income families, renters and owners, elderly persons, persons with disabilities, including persons with HIV/AIDS and their families, single persons, large families, public housing residents, victims of domestic violence, families on the public housing and section 8 tenant-based waiting list, and discuss specific housing problems, including: cost-burden, severe cost-burden, substandard housing, and overcrowding (especially large families).
2. To the extent that any racial or ethnic group has a disproportionately greater need for any income category in comparison to the needs of that category as a whole, the jurisdiction must complete an assessment of that specific need. For this purpose, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category as a whole.

3-5 Year Strategic Plan Housing Needs response:

1. HOUSING NEEDS

The tables below (consistent with HUD Table 2A) provide estimates of the housing needs among low-income and moderate-income families in Lowell. The information presented is based primarily on data from HUD's Comprehensive Housing Affordability Strategy (CHAS) and City of Lowell estimates.

HUD released new CHAS data reflecting the U.S. Census American Community Survey (ACS) data. With the exception of some major cities, this updated CHAS data is available at the county-level. While in general, similar housing programs, income categories, and household types were used in the new CHAS data, the sample of households surveyed each year through the ACS is smaller than the sample for the prior decennial census making the new CHAS data not directly comparable to the 1990 and 2000 CHAS. The ACS data is generated from random surveys and has larger rates of error than the decennial census. As discussed earlier in this document, in most instances the City will continue to rely on the 2000 Decennial Census throughout this report.

The tables document many areas where households are facing cost burdens (housing costs which exceed 30% of household income) and severe cost burdens (housing costs which exceed 50% of household income). Many of the households identified as having housing problems that do not face cost burdens are subject to overcrowding or substandard conditions. According to the 2000 US Census, 10% of housing units in Lowell have occupancies greater than 1.01 persons per room and 4% have

occupancies greater than 1.51 persons per room. In 2000, 2.3% of rental units lacked complete plumbing facilities and 2.1% lacked complete kitchen facilities.

In addition, an analysis of epidemiological data from the U.S. Center for Disease Control and the Massachusetts Department of Public Health yields an estimate of 458 individuals living with HIV/AIDS in Lowell as of January 2008. The same study estimates that there are 2,678 individuals living with HIV/AIDS throughout Middlesex County, Lowell's HOPWA service area. The vast majority of these cases represent unique households, most of whom can be presumed to have some housing need.

Estimated Housing Needs
Households Earning Less than 30% of the Area Median Income

Renter	Elderly	NUMBER OF HOUSEHOLDS	100%	1,886
		With Any Housing Problems	55.7	1,051
		Cost Burden > 30%	54.4	1,026
		Cost Burden >50%	35.9	678
	Small Related	NUMBER OF HOUSEHOLDS	100%	2,265
		With Any Housing Problems	74	1,675
		Cost Burden > 30%	70	1,585
		Cost Burden >50%	47.7	1,080
	Large Related	NUMBER OF HOUSEHOLDS	100%	865
		With Any Housing Problems	90.2	780
		Cost Burden > 30%	78.6	680
		Cost Burden >50%	48	415
	All other hsholds	NUMBER OF HOUSEHOLDS	100%	2,084
		With Any Housing Problems	67.4	1,404
		Cost Burden > 30%	64.7	1,349
		Cost Burden >50%	48.9	1,020
Owner	Elderly	NUMBER OF HOUSEHOLDS	100%	828
		With Any Housing Problems	78.4	649
		Cost Burden > 30%	78.4	649
		Cost Burden >50%	55	455
	Small Related	NUMBER OF HOUSEHOLDS	100%	310
		With Any Housing Problems	90.3	280
		Cost Burden > 30%	90.3	280
		Cost Burden >50%	72.6	225
	Large Related	NUMBER OF HOUSEHOLDS	100%	59
		With Any Housing Problems	93.2	55
		Cost Burden > 30%	86.4	51
		Cost Burden >50%	72.9	43
	All other hsholds	NUMBER OF HOUSEHOLDS	100%	175
		With Any Housing Problems	80	140
		Cost Burden > 30%	80	140
		Cost Burden >50%	68.6	120
Hsholds with a Disabled Member		NUMBER OF HOUSEHOLDS	100%	4236
		With Any Housing Problems	71.2	3016

Source: CHAS Data, 2000 US Census

Estimated Housing Needs
Households Earning 30-50% of the Area Median Income

Renter	Elderly	NUMBER OF HOUSEHOLDS	100%	632
		With Any Housing Problems	50.2	317
		Cost Burden > 30%	49.5	313
		Cost Burden >50%	7.8	49
	Small Related	NUMBER OF HOUSEHOLDS	100%	1,460
		With Any Housing Problems	61	890
		Cost Burden > 30%	52.7	770
		Cost Burden >50%	5.1	75
	Large Related	NUMBER OF HOUSEHOLDS	100%	659
		With Any Housing Problems	72.7	479
		Cost Burden > 30%	31	204
		Cost Burden >50%	1.5	10
	All other hsholds	NUMBER OF HOUSEHOLDS	100%	1,105
		With Any Housing Problems	73.8	815
		Cost Burden > 30%	68.8	760
		Cost Burden >50%	17.2	190
Owner	Elderly	NUMBER OF HOUSEHOLDS	100%	884
		With Any Housing Problems	19.1	169
		Cost Burden > 30%	18.7	165
		Cost Burden >50%	11.3	100
	Small Related	NUMBER OF HOUSEHOLDS	100%	447
		With Any Housing Problems	74.3	332
		Cost Burden > 30%	73.4	328
		Cost Burden >50%	33.3	149
	Large Related	NUMBER OF HOUSEHOLDS	100%	163
		With Any Housing Problems	75.5	123
		Cost Burden > 30%	73	119
		Cost Burden >50%	11.7	19
	All other hsholds	NUMBER OF HOUSEHOLDS	100%	243
		With Any Housing Problems	71.2	173
		Cost Burden > 30%	71.2	173
		Cost Burden >50%	46.5	113
Hsholds with a Disabled Member		NUMBER OF HOUSEHOLDS	100%	1958
		With Any Housing Problems	58.9	1153

Source: CHAS Data, 2000 US Census

Estimated Housing Needs
Households Earning 50-80% of the Area Median Income

Renter	Elderly	NUMBER OF HOUSEHOLDS	100%	318
		With Any Housing Problems	13.5	43
		Cost Burden > 30%	13.5	43
		Cost Burden >50%	0	0
	Small Related	NUMBER OF HOUSEHOLDS	100%	1,663
		With Any Housing Problems	17	283
		Cost Burden > 30%	10.7	178
		Cost Burden >50%	0.6	10
	Large Related	NUMBER OF HOUSEHOLDS	100%	580
		With Any Housing Problems	62.9	365
		Cost Burden > 30%	4.3	25
		Cost Burden >50%	0	0
	All other hsholds	NUMBER OF HOUSEHOLDS	100%	1,554
		With Any Housing Problems	21.5	334
		Cost Burden > 30%	18	280
		Cost Burden >50%	0.6	10
Owner	Elderly	NUMBER OF HOUSEHOLDS	100%	862
		With Any Housing Problems	17.6	152
		Cost Burden > 30%	15.9	137
		Cost Burden >50%	3.9	34
	Small Related	NUMBER OF HOUSEHOLDS	100%	938
		With Any Housing Problems	46.7	438
		Cost Burden > 30%	46.3	434
		Cost Burden >50%	9.6	90
	Large Related	NUMBER OF HOUSEHOLDS	100%	560
		With Any Housing Problems	53.6	300
		Cost Burden > 30%	40.2	225
		Cost Burden >50%	1.8	10
	All other hsholds	NUMBER OF HOUSEHOLDS	100%	435
		With Any Housing Problems	60.9	265
		Cost Burden > 30%	60.9	265
		Cost Burden >50%	8	35
Hsholds with a Disabled Member		NUMBER OF HOUSEHOLDS	100%	1382
		With Any Housing Problems	31.5	435

Source: CHAS Data, 2000 US Census

There is most likely substantial overlap between the families described in the above tables and those on the public housing and tenant-based Section 8 certificate waitlists. The table below describes the families on these lists as of June 2009. The

Section 8 wait list has been closed for four and half years. The Public Housing wait list is not closed.

Housing Needs of Families on Lowell Housing Authority Waiting Lists

	Public Housing		Section 8	
	Families	%	Families	%
Waiting List Total	3583	100%	3721	100%
Extremely Low Income (<=30% AMI)	3264	91%	3290	88.4%
Very Low Income (>30% but <=50% AMI)	284	7.9%	377	10.1%
Low Income (>50% but <=80% AMI)	40	1.1	54	1.5%
Families with Children	1482	41%	2017	54.2%
Disabled Elderly	217	6.0%	161	4.3%
Non-Elderly Families with Physical and/or Mental Disabilities	848	2.4%	830	22.3%
White	1188	3.3%	1407	37.8%
Black	172	4.8%	482	13.0%
Hispanic	1714	4.8%	1568	42.1%
American Indian	7	0.2%	11	0.3%
Asian	500	1.4%	249	6.7%
Zero Bedroom	76	2.1%	N/A	N/A
One Bedroom	1569	4.4%	1169	31.4%
Two Bedrooms	1590	4.4%	1510	40.6%
Three Bedrooms	307	8.6%	852	22.9%
Four Bedrooms	34	0.9%	167	4.5%
Five Bedrooms	7	0.2%	16	0.4%
5+ Bedrooms	0	0%	7	0.2%

Source: LHA 2009 Annual Plan

Based on assessments of housing and construction costs in Lowell, the table below illustrates the City of Lowell's estimates of the average and total subsidy amounts that would be needed to address the CHAS housing needs outlined above. The average per unit subsidies are calculated by assuming that a household can pay up to 30% of their annual income on rent/mortgage payments and utilizes prevailing market costs for housing construction and sales. The subsidy required is the difference between what the market costs per housing unit are and the total amount the household can pay either as payments toward a 30-year mortgage or rental payments to cover a landlord's financing costs and a small profit margin.

	Households with Need	Average Subsidy Required per Unit	Total Subsidy Required
0-30% AMI	6034	\$190,000	\$1,146,460,000
30-50% AMI	3298	\$100,000	\$329,800,000
50-80% AMI	2180	\$30,000	\$65,400,000
TOTAL	20975		\$1,541,660,000

2. DISPROPORTIONATE HOUSING NEEDS

The table below documents the proportions of all households in Lowell with housing needs identified by HUD's Comprehensive Housing Affordability Strategy (CHAS). Data is presented for various household income levels relating to the area median household income. The final column presents the thresholds over which minority groups would be identified as having a disproportionate housing need relative to the population as a whole.

The first table highlights statistics from the 2000 CHAS Data. The second table uses statistics collected from the 2009 CHAS/ACS Data. While it's important to remember that the ACS Data is difficult to compare with the 2000 CHAS Data, it is worthwhile noting that a significant increase in the percentage of households with housing problems has occurred among families earning more than 80% of the Median Family Income. This is likely due to the recent financial recession felt nationwide that has significantly impacted the value of homes causing many homeowners to lose their property as a result of foreclosure.

Median Family Income	Total Households	Households with Any Housing Problem	% with Any Housing Problems	Disproportionate Need Threshold
< 30% MFI	8,472	6,032	71.2%	81.2%
30.01 - 50% MFI	5,593	3,300	59.0%	69.0%
50.01 - 80% MFI	6,910	2,177	31.5%	41.5%
> 80.01% MFI	16,861	1,821	10.8%	20.8%

Source: 2000 CHAS Data

Median Family Income	Total Households	Households with Any Housing Problem	% with Any Housing Problems
< 30% MFI	9,240	6,780	73.4%
30.01 - 50% MFI	5,110	3,415	66.8%
50.01 - 80% MFI	7,600	3,465	45.6%
> 80.01% MFI	21,950	13,660	62.2%

Source: 2009 CHAS/ACS Data

The following table presents 2000 CHAS housing need data for ethnic and racial groups in Lowell.

Median Family Income	Total Minority Households	Households with Any Housing Problem	% with Any Housing Problems	Disproportionate Need Threshold Exceeded?
BLACK NON-HISPANIC HOUSEHOLDS				
< 30% MFI	228	148	64.9%	No
30.01 - 50% MFI	205	135	65.9%	No
50.01 - 80% MFI	258	95	36.8%	No
> 80.01% MFI	487	78	16.0%	No
ASIAN NON-HISPANIC HOUSEHOLDS				
< 30% MFI	940	740	78.7%	No
30.01 - 50% MFI	580	440	75.9%	Yes
50.01 - 80% MFI	800	365	45.6%	Yes
> 80.01% MFI	1,855	501	27.0%	Yes
HISPANIC HOUSEHOLDS				
< 30% MFI	1,694	1,215	71.7%	No
30.01 - 50% MFI	864	530	61.3%	No
50.01 - 80% MFI	789	299	37.9%	No
> 80.01% MFI	959	185	19.3%	No

Source: 2000 CHAS Data

Based on this analysis, three income groups among Asians were found to have a disproportionate housing need relative to the City's population as a whole with comparable household incomes. Unfortunately, CHAS data for Asian populations is extremely limited and does not specify the nature of the housing problems identified or the demographic characteristics of the households experiencing the problems.

The table below illustrates 2009 CHAS/ACS data for households with housing problems by race. While households of all races face housing challenges, this data shows a disproportionate share of housing problems among extremely low-income white owners. This is likely due to recent foreclosure crisis impacting communities nationwide. In many cases, households fell victim to sub-prime mortgages resulting in the inability to continue paying their loans when interest rates increased.

Discussion on the City's efforts to address the foreclosure crisis is discussed in other sections of this document.

Race with Housing Problems	Severe Cost Burden		Moderate Cost Burden		No Cost Burden		Total Moderate and Severe		Total <=80% AMI
	Owner	Renter	Owner	Renter	Owner	Renter	Owner	Renter	
White	81.06%	57.08%	74.32%	46.51%	80.86%	55.31%	76.97%	51.91%	65.96%
Black	2.91%	2.11%	3.77%	5.88%	3.95%	8.74%	3.43%	3.95%	5.15%
Asian	11.29%	6.67%	10.60%	14.32%	9.71%	19.83%	10.87%	10.41%	13.30%
American Indian	0.00%	0.00%	0.00%	1.22%	0.00%	0.00%	0.00%	0.60%	0.14%
Pacific Islander	0.00%	0.00%	0.00%	0.00%	0.14%	0.00%	0.00%	0.00%	0.04%
Hispanic	3.46%	28.54%	8.13%	25.09%	4.41%	15.15%	6.29%	26.85%	12.90%
Other	1.28%	5.61%	3.18%	6.98%	0.93%	0.97%	2.43%	6.28%	2.52%

Source: 2009 CHAS/ACS Data

The City recognizes that the analysis of 2000 CHAS Data is still important to consider in addressing housing needs of the community. Based on consultations with Asian community leaders in Lowell, a major cause of this disparity may be the difficulty that Asian immigrants in Lowell, the majority of whom are Cambodian, have establishing credit histories. For cultural and economic reasons, Southeast Asian immigrants often come to Lowell with no reported credit history and no history of banking activity. As a result, credit checks that are routinely run by landlords and mortgage financiers prior to leasing or purchasing housing often fail to result in qualifying credit scores for these populations. This lack of strong credit can result in denial of apartments or mortgages, forcing the applicant into less desirable or less adequate housing, regardless of the income level of the applicant. Often this lack of credit has no relationship to the applicant's real ability to pay based on income or available resources, which may explain the higher disparity of housing needs among Asians with higher incomes.

The City of Lowell works closely to involve Asian community in first time homebuyer training and other housing assistance programs. The first time homebuyer training courses, some of which are offered in Khmer, include lessons dealing with establishing and maintaining credit. The City and its subrecipients will continue to aggressively market these programs, along with fair housing education programs to this community with a goal of reducing these housing affordability disparities in future years.

Priority Housing Needs (91.215 (b))

1. Identify the priority housing needs and activities in accordance with the categories specified in the Housing Needs Table (formerly Table 2A). These categories correspond with special tabulations of U.S. census data provided by HUD for the preparation of the Consolidated Plan.
2. Provide an analysis of how the characteristics of the housing market and the severity of housing problems and needs of each category of residents provided the basis for determining the relative priority of each priority housing need category.

Note: Family and income types may be grouped in the case of closely related categories of residents where the analysis would apply to more than one family or income type.

3. Describe the basis for assigning the priority given to each category of priority needs.
4. Identify any obstacles to meeting underserved needs.

3-5 Year Strategic Plan Priority Housing Needs response:

1. PRIORITY HOUSING NEEDS

The following table outlines the City of Lowell's priority housing needs for the 2010-2015 Consolidated Plan period. Activities which are labeled as "High" priorities in the tables below and elsewhere in this plan are those which will receive Consolidated Plan funding assuming level funding of the City's formula grants over the next five years. Activities which are identified as "Medium" priorities are those which will likely receive Consolidated Plan funding if the applicable formula grants to the City of Lowell are increased during the next five years and may also receive funds if particularly strong projects are identified. Activities that receive a "Low" priority will not receive Consolidated Plan funding over the next five years without an amendment to this Consolidated Plan.

HOUSING NEED	PRIORITY	FUND SOURCE
<u>RENTAL HOUSING</u>		
0-30% of Area Median Income (AMI) Elderly	Medium	HOME, Other
0-30% AMI Small Related	Medium	HOME, Other
0-30% AMI Large Related	Medium	HOME, Other
0-30% Other	Medium	HOME, Other
30-50% AMI Elderly	Medium	HOME, Other
30-50% AMI Small Related	High	HOME, Other
30-50% AMI Large Related	High	HOME, Other
30-50% Other	High	HOME, Other
50-80% AMI Elderly	Low	Other
50-80% AMI Small Related	Medium	HOME, CDBG, Other
50-80% AMI Large Related	Medium	HOME, CDBG, Other
50-80% Other	Medium	HOME, CDBG, Other
<u>OWNER-OCCUPIED HOUSING</u>		
0-30% AMI Elderly	Medium	HOME, Other
0-30% AMI Small Related	Medium	HOME, Other
0-30% AMI Large Related	Medium	HOME, Other
0-30% Other	Medium	HOME, Other
30-50% AMI Elderly	Medium	HOME, Other
30-50% AMI Small Related	High	HOME, Other
30-50% AMI Large Related	High	HOME, Other
30-50% Other	High	HOME, Other
50-80% AMI Elderly	Medium	HOME, CDBG, Other
50-80% AMI Small Related	High	HOME, CDBG, Other
50-80% AMI Large Related	High	HOME, CDBG, Other
50-80% Other	High	HOME, CDBG, Other

2-3. BASIS FOR ASSIGNING PRIORITIES

The priorities above are a reflection of four key factors listed in order of emphasis, beginning with the most important: the Julian D. Steele Reinvention and Replication Plans, housing market conditions, a strong desire to increase the homeownership rate in the City of Lowell, the City's 10-Year Plan to End Homelessness, and the relative severity of needs. Each of these influences is discussed below.

A. THE JULIAN D. STEELE REINVENTION AND REPLICATION PLANS

In addressing priority housing needs in the City of Lowell it is crucial to highlight an action that is a driving factor in the City's efforts to provide safe, clean and affordable housing for those in need. On December 18, 2002 the State Legislature approved a plan (Chapter 97 of the Acts of 2002) that allowed the Lowell Housing Authority (LHA) to replace the troubled 224-unit Julian D. Steele state-funded public housing project with a new neighborhood consisting of 180 mixed income units. These units will be constructed in single and two-family owner-occupied homes.

The construction is privately financed through a consortium of local banks offering \$24 million dollars to the selected developers of the project. As a partner in this effort, the City of Lowell has committed to using a combination of Consolidated Plan funds, Low Income Housing Tax Credits (LIHTC), project-based subsidies, and private funding to create 220 units of affordable housing scattered throughout the City and referred to as "Replication Units." The planned Replication Units carry the following affordability restrictions:

Affordable to households at or below 50% AMI for 30 years	79 Units
Affordable to households at or below 50% AMI for 15 years	78 Units
Affordable to households at or below 80% AMI for 30 years	32 Units
Affordable to households at or below 80% AMI for 15 years	31 Units
TOTAL Replication Units	220 Units

The 15-30 year affordability periods required for the Replication Units exceed HUD's HOME Program requirements. A priority goal is to complete the remaining 35 Replication Units at or below 50% AMI for 15 years in the next five years. These projects will consist of substantial rehabilitation and high quality new construction, subject to the City's policy of utilizing Energy Star standards for all the new and substantially rehabbed units.

The following table outlines the City's progress to date in completing the Replication Plan.

Affordable to households at or below 50% AMI for 30 years		
	Completed	79
	Under Construction/Permitting	0
	Sites Selected/Out to Bid	0
Affordable to households at or below 50% AMI for 15 years		
	Completed	43
	Under Construction/Permitting	0
	Sites Selected/Out to Bid	0
Affordable to households at or below 80% AMI for 30 years		
	Completed	89
	Under Construction/Permitting	0
	Sites Selected/Out to Bid	0
Affordable to households at or below 80% AMI for 15 years		
	Completed	33
	Under Construction/Permitting	0
	Sites Selected/Out to Bid	0

As a result, the City's priority in completing the Replication Plan requirements over the next five years is to construct an additional 35 units that will be affordable to households earning 50% of the Area Median Income or less with 15 year deed restrictions. The JDS lawsuit was settled with the proviso that these 35 units be located in "Opportunity Areas" outlined by the plaintiffs.

This need to complete the Replication Plan mandates translates to an emphasis on addressing the housing needs of family households earning between 30% and 50% AMI among the CHAS housing need categories above.

B. MARKET CONDITIONS

Market conditions have a significant and deterministic impact on the City of Lowell's priority housing needs. As is discussed in the Housing Needs section of this plan, under current construction and housing market conditions, the City of Lowell estimates that an average subsidy of approximately \$30,000 is required for each unit that is affordable to households earning between 50% and 80% of AMI. Approximately \$100,000 in subsidy is required for each unit that is affordable for households earning between 30% and 50% of AMI and \$190,000 is required for each

unit that is affordable for households earning between 0 and 30% of AMI. As a result, the City calculates that more than \$1.5 billion in subsidy would be required to address all of the housing needs identified in the CHAS tables for the City of Lowell. Because we anticipate having approximately \$9,600,000 in Consolidated Plan funds available over the next five years, even if matched 3:1 or 4:1 with other funding, the City would only be able to meet approximately 2.5% of the total housing needs identified. As a result, the City has placed a higher priority on meeting the needs of households earning between 30% and 80% AMI so that a greater number of housing units can be assisted than would be possible with the much more substantial subsidy demands required to create units affordable to those earning between 0 and 30% AMI. An exception to this approach are projects which directly assist homeless persons in making the transition to permanent housing.

The recent surge in foreclosures nationwide is affecting our local and national economies. Home foreclosures and sub-prime mortgages impact existing homeowners, and neighborhoods. In 2008, the City of Lowell had the fifth highest number of foreclosures in the Massachusetts. The growing vacancy rates and incidences of property abandonment impacted adjacent property values and neighborhood quality. Fortunately, unlike many other communities in the Commonwealth, most of these properties are not staying vacant long and are being purchased on the open real estate market with little intervention from the City. The City, with the use of Neighborhood Stabilization Plan funds will target resources to those properties that need higher levels of investment and rehabilitation to attract developers.

C. PROMOTING HOME OWNERSHIP

In part a response to market conditions, Lowell's Master Plan expresses a clear goal of increasing the rate of homeownership in Lowell's neighborhoods. The City recognizes the value of homeownership in creating and promoting neighborhood stability and cohesion. The 2000 Census reported that the City's homeownership rate was 43%, well below the national average of 66.2%. Minority homeownership rates are even lower in Lowell. The City believes that the rates have increased somewhat since 2000; however, a large gap remains. In order to continue to improve the City's rate of homeownership, a priority has been placed on addressing the housing needs related to owner-occupied housing. The City will continue to place a high priority on supporting projects which provide first time homebuyers with downpayment assistance and training programs as well as those which create opportunities for new owner-occupied units to be created. Homebuyer training and assistance programs will be offered in multiple languages and particular efforts will be paid to encouraging members of minority communities to participate in these programs.

D. 10-YEAR PLAN TO ENDING HOMELESSNESS

Numerous studies have argued about the cost effectiveness of providing homelessness prevention services and permanent housing placement for individuals and families versus the more traditional approach of transitional shelter programs. In 2008 the City of Lowell released the *Partnership for Change: 10 Year Plan to End Homelessness* outlining goals to ending homelessness in Lowell. The Action Plan provides a broad roadmap to assess the current system of "managing" homelessness and explores the new, more innovative and cost effective "Prevention" and "Housing First" approaches that are greatly reducing and/or eliminating homelessness in communities all across America. The City will focus efforts during the 2010-2015

Consolidated Plan period to implement the goals of the 10-Year Plan. Understanding the limited resources available to continue to support shelter operations and the need to support homelessness prevention and rapid re-housing programs, the City will emphasize the housing needs of individuals and families earning less than 50% AMI.

E. SEVERITY OF NEEDS

In addition to the factors identified above, the City recognizes that certain housing needs are more acute than others. Once the other factors identified above are considered, the City will prioritize projects which address those needs that have been documented as the more severe prior to those which are less acute.

4. OBSTACLES TO MEETING UNDERSERVED NEEDS

As discussed above, the City has calculated that \$1.5 billion would be required to address all of the identified housing needs in Lowell. Without question the largest impediment to addressing these needs is the cost of housing production coupled with the limited availability of funds. At the current rate of public and private funding availability for affordable housing activities under current market conditions, the City can address approximately one half of one percent of the total housing need each year. As is discussed in the Barriers to Affordable Housing Production section below, there are few factors influencing the costs of housing production that are within the City's control that have not been ameliorated in recent years. The remaining and more substantial factors are products of the regional housing market and State and Federal policies that impact local government revenue generation.

Housing Market Analysis (91.210)

*Please also refer to the Housing Market Analysis Table in the Needs.xls workbook

1. Based on information available to the jurisdiction, describe the significant characteristics of the housing market in terms of supply, demand, condition, and the cost of housing; the housing stock available to serve persons with disabilities; and to serve persons with HIV/AIDS and their families. Data on the housing market should include, to the extent information is available, an estimate of the number of vacant or abandoned buildings and whether units in these buildings are suitable for rehabilitation.
2. Describe the number and targeting (income level and type of household served) of units currently assisted by local, state, or federally funded programs, and an assessment of whether any such units are expected to be lost from the assisted housing inventory for any reason, (i.e. expiration of Section 8 contracts).
3. Indicate how the characteristics of the housing market will influence the use of funds made available for rental assistance, production of new units, rehabilitation of old units, or acquisition of existing units. Please note, the goal of affordable housing is not met by beds in nursing homes.

3-5 Year Strategic Plan Housing Market Analysis responses:

1. MARKET CHARACTERISTICS

A. SUPPLY

During the 1990s, the total number of occupied housing units in Lowell increased by 2.3%, despite a reduction in the total number of units, according to the U.S. Census Bureau. This reduction may be attributable to the demolition of vacant and abandoned substandard housing and a decade of limited housing production, as a result of market conditions. The removal of blighted and abandoned buildings may have improved the livability of neighborhoods and contributed to the increase in the number of occupied units. In 2000, the majority (57%) of the City's housing units were renter-occupied, as indicated in the table below. This percentage dropped slightly between 1990 and 2000, as the number of owner-occupied units increased.

City of Lowell: Housing Units by Tenure

	1990		2000		2006-2008 ACS Data	
	Number	Percent	Number	Percent	Number	Percent
Total No. of Units	40,302		39,468		39,927	
Total No. of Occupied Units	37,019		37,887		36,463	
Ownership Units	15,508	41.0%	16,309	43.0%	18,694	51.3%
Rental Units	21,511	58.1%	21,578	57.0%	17,769	48.7%

Source: U.S. Census Bureau, 1990, 2000, 2006-08 American Community Survey Data

The 2006-2008 American Communities Survey, while only representing a sample of data for Lowell provides a more current picture of Lowell's changing housing tenure. A combination of new ownership units in Lowell's downtown census tracts as well as

strong support for technical and financial assistance to first time homebuyers have resulted in an increase in owner-occupied units.

While Lowell's 51% homeownership rate is well below the national average of 67% and the state average of 64.9%, Lowell's homeownership rates among minority groups are lower still. This is due in part to recent immigration status of many of Lowell's minority residents, but other factors certainly contribute. The table below illustrates the homeownership rates among racial and ethnic groups in Lowell.

City of Lowell: Housing Tenure Among Minority Groups (2000)

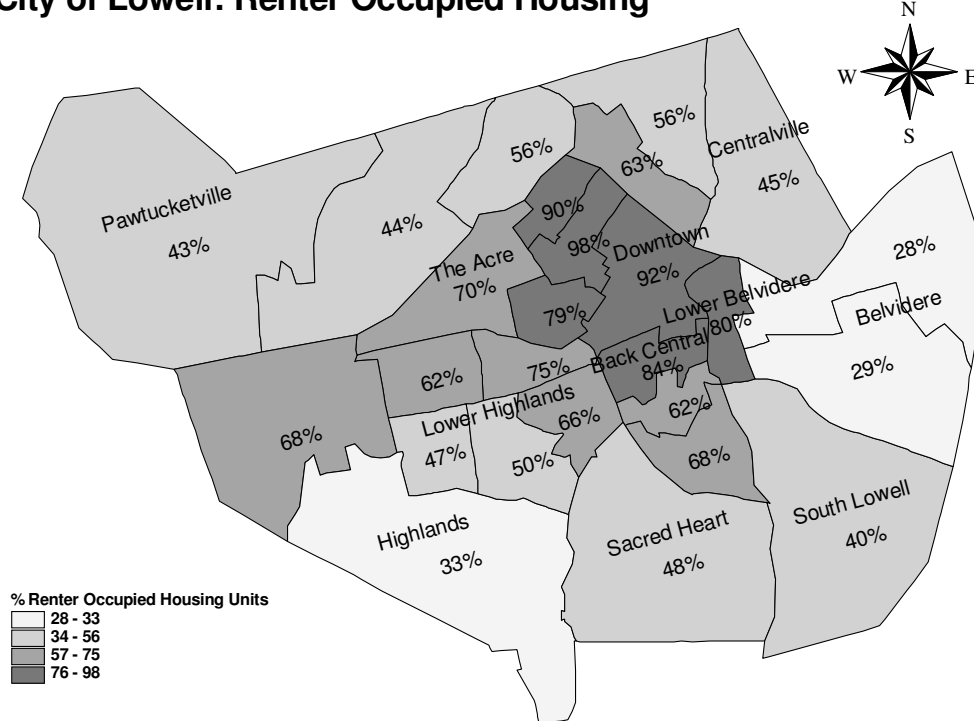
	Owner-Occupied		Renter-Occupied	
	Housing Units	Percent.	Housing Units	Percent.
Black/African-American	280	19.1%	1186	80.9%
American Indian/Alaskan Native	24	25.5%	70	74.5%
Asian/Hawaiian/Pacific Islander	1258	30.1%	2919	69.9%
Other/Two or More Races	579	18.5%	2557	81.5%
Hispanic or Latino	2577	18.6%	11290	81.4%

Source: U.S. Census 2000

Note: More current data through the American Community Survey is not available

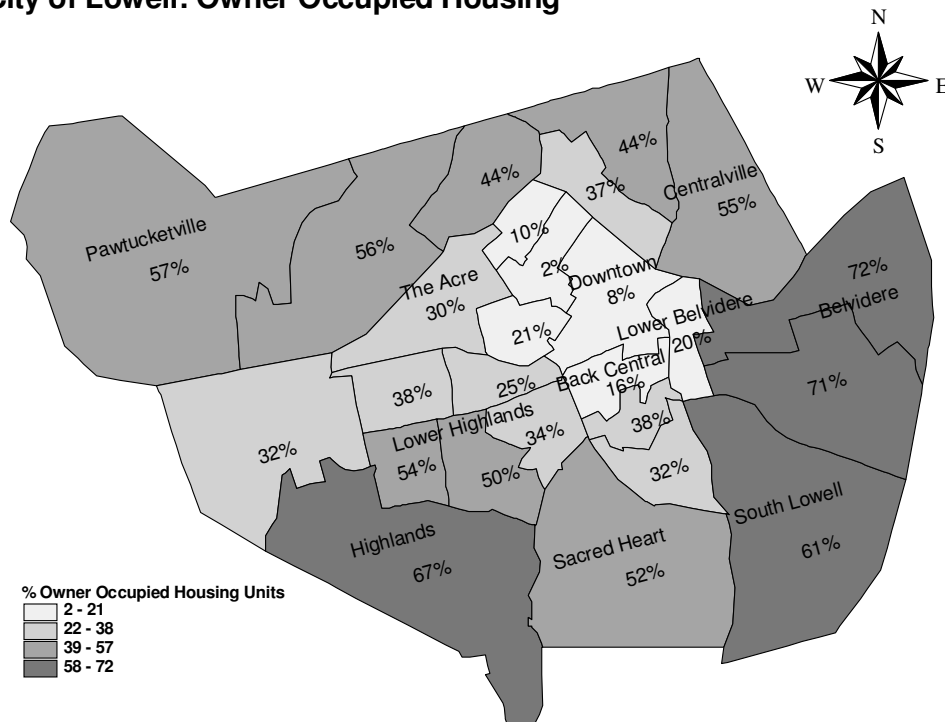
As the maps below indicate, the majority of rental units in Lowell are located in the center city. According to the 2000 U.S. Census, these neighborhoods are predominantly low-income and high-minority concentrated census block groups. The Acre and Downtown sub markets, in particular, have the highest percentage of renter occupied housing. Conversely, the neighborhoods on the outer ring of the City have the lowest percentage of rental units, but have high concentrations of ownership units. These figures have likely shifted somewhat with additional ownership units created in Downtown census tracts since 2000, however more current data by census tract and block group is unavailable at this time.

City of Lowell: Renter Occupied Housing



Source: U.S. Census Bureau, 2000

City of Lowell: Owner Occupied Housing



Source: U.S. Census Bureau, 2000

Regionally, the City of Lowell has the largest percentage of rental housing units. The table below illustrates the number of occupied rental housing units in the Lowell, MA-NH PMSA², according to the 2000 U.S. Census. The lack of rental units in the surrounding suburbs places a greater demand and higher price pressures on the City's rental market.

Lowell, MA-NH PMSA: Occupied Rental Housing Units (2000)

	Billerica	Chelmsford	Dracut	Dunstable	Groton	Lowell	Pepperell	Tewksbury	Tyngsboro	Westford
No. of Rental Units	2,020	2,069	2,250	62	528	21,578	792	1,087	587	550
% of Total Housing Units	15.6%	16.1%	21.5%	6.7%	16.2%	57.0%	20.6%	10.9%	15.7%	8.1%

Source: U.S. Census Bureau, 2000

The 2006-2008 ACS Census data documented a 2.6% vacancy rate for ownership housing units and a 7.5% vacancy rate for rental units. In both cases, these rates

² The Lowell, MA-NH PMSA includes: Billerica, Chelmsford, Dracut, Dunstable, Groton, Lowell, Pepperell, Tewksbury, Tyngsboro, Westford, MA; and Pelham, NH. For the purpose of this report, the town of Pelham, NH is not included in the analysis.

have doubled since the 2000 Census and can most likely be attributable to the increasing incidence of foreclosure since that time. The 2000 Census reported 1,581 total vacant units, 699 of which were available for rent. Based on discussions with the Greater Lowell Landlords Association (GLLA), the current vacancy rate is more likely around 15 or 20%. This increase has resulted in part from a reduction in demand as a strong condominium market and low mortgage interest rates have enabled many people who might otherwise have rented to purchase units. A portion of this vacancy rate may also be due to landlords' reluctance to rent to potential tenants with limited ability to pay. According to the GLLA, landlords are reluctant to take on the risk of renting to households with poor, or no credit history. As part of the City's efforts in addressing goals of the 10 Year Plan to End Homelessness, a Landlords Subcommittee was formed to help better educate and address some of these risks and resources available to both landlords and tenants.

B. CONDITION OF HOUSING STOCK

The majority of Lowell's housing stock was built prior to 1950 (52% of rental units and 68% of ownership units). Because of the age of Lowell's housing, there is a high prevalence of substandard units and units containing lead paint. This is particularly true among rental units. The 2006 Analysis of the Impediments to Fair Housing report, prepared by the City of Lowell, indicated that the existence of lead paint has contributed to discrimination practices in rental real estate. According to the report, many landlords in Lowell are reluctant to rent to families with young children, particularly because of lead paint laws and the high cost of compliance.

A second major concern with Lowell's rental housing supply is the percentage of units considered substandard, as defined by the U.S. Census. In 2000, 2.3 % of rental units in the City lacked complete plumbing facilities, while 2.1% lacked complete kitchen facilities.

A result of limited quality housing coupled with the high cost of housing has forced extended or multiple families to share housing space. As a result, overcrowding has become an issue in the City. The U.S. Census Bureau defines overcrowding as a household with greater than 1.01 persons per room, excluding bathrooms, kitchens, hallways, and porches. Severe overcrowding occurs when more than 1.51 persons per room reside in a unit. Data from the 2000 Census indicates that more than 10% of rental housing units in Lowell are overcrowded while 4% are severely overcrowded.

C. NEW CONSTRUCTION

While the number of building permits issued for new single-family home construction in the last five years has fluctuated, the number of permits granted for two-family and multifamily developments have significantly dropped since 2004. According to recent data from the City's Inspectional Services Department, the number of permits granted for two or more unit developments reached an all-time high in 2004. This increase is no doubt a result of the strong housing market and low interest rates, which have encouraged multifamily investor-owned property sales in Lowell.

City of Lowell: Building Permit Profile (2004-2008)

		Single Family	Two- Family	Multi- Family	Total new residential units
2004	Permits	51	29	15	
	Units	51	58	116	225
2005	Permits	77	20	16	
	Units	77	40	191	308
2006*	Permits	48	32	87	
	Units	48	33	108	189
2007	Permits	18	15	45	
	Units	18	16	49	83
2008	Permits	33	37	16	
	Units	33	37	16	86

* Beginning this year, the permitting process required that each unit have its own permit, instead of each building
Source: Dept. of Building Inspection - City of Lowell

The table above does not include adaptive reuse projects. In the past five years there have been over 700 residential units constructed through the adaptive reuse of existing buildings located in downtown, a number of which are affordable to families earning 80% of the area median income or less. 325 additional units have been permitted in downtown, with a number of them currently under construction. Of these 325 units over 150 of them will be affordable to households earning 80% of the area median income (AMI) or less.

According to the City's Dept. of Inspectional Services, building permits generally carry a construction cost of between \$80,000 and \$150,000 per unit depending on the size of the project. While no information is maintained locally regarding overall construction costs, the National Association of Home Builders (NAHB) tracks this information regionally. The table below compares the change in construction costs in the past ten years. While construction costs on the west coast have increased more than 50% in the past ten years, costs in the Northeast still remain higher than the national average.

Year	United States	Northeast	West
1998	\$67.83	\$79.04	\$74.45
2008	\$88.55	\$114.36	\$112.20
% change	31%	47%	51%

Source: National Association of Home Builders

D. MARKET TRENDS

Rental Units

Using 2000 U.S. Census data, the National Low Income Housing Coalition (NLIHC) calculated that more than 30% of households in the Lowell, MA-NH PMSA are renters. 20% of these households live below the poverty level.

According to the NLIHC's recently released *Out of Reach, 2009* report, the 2009 Fair Market Rent (FMR) for a two-bedroom apartment in the Lowell, MA-NH PMSA is \$1,285. The estimated median annual income for renters in the region is \$42,463. Based on the assumption that a household spends 30% of its income on housing,

NLIHC calculated that households would need an annual income of \$51,400 to afford a two-bedroom unit at FMR. An individual earning minimum wage (\$8.00/ hour in Massachusetts) would need to work 124 hours a week to afford a two-bedroom unit at FMR in the Greater Lowell region. According the NLIHC statistics, an individual would need to earn 309% of the Massachusetts minimum wage (or \$24.71 an hour) in order to afford a two-bedroom rental unit at the 2009 FMR. The following table illustrates the 2009 FMRs for the Lowell, MA-NH PMSA.

Lowell HMFA Fair Market Monthly Rents

Lowell HMFA Fair Market Monthly Rents					
	0 BR	1 BR	2 BR	3 BR	4 BR
Fair Market Rent	\$835	\$1,000	\$1,285	\$1,534	\$1,683

Source: National Low-Income Housing Coalition, *Out of Reach 2009*

The table below illustrates the income needed to afford housing units at the 2009 FMR.

Income Needed to Afford FMR

	Annual Income					Percent of Family AMI				
	0 BR	1 BR	2 BR	3 BR	4 BR	0 BR	1 BR	2 BR	3 BR	4 BR
Lowell	\$33,400	\$40,000	\$51,400	\$61,360	\$67,320	38%	45%	58%	69%	76%
Massachusetts	\$36,357	\$39,976	\$47,769	\$57,292	\$63,753	44%	48%	57%	69%	77%

Source: NLIHC, *Out of Reach 2009*

According to HUD's estimates for median rental rates in the Lowell, MA-NH PMSA, rents have increased in Greater Lowell by over 4% from FY2008 to FY2009. Despite the increase, regionally, 2000 Census data show that Lowell maintains the lowest median gross rent among surrounding suburban communities. The variations in rental prices among these communities suggest added pressure on Lowell's rental market as households in the region search for affordable rental units.

Lowell, MA-NH PMSA: Median Gross Rent (2000)

	Billerica	Chelmsford	Dracut	Dunstable	Groton	Lowell	Pepperell	Tewksbury	Tyngsboro	Westford	Middlesex County	Massachusetts
Med. Gross Rent	\$897	\$777	\$725	\$908	\$728	\$627	\$697	\$936	\$701	\$690	\$835	\$684

Source: U.S. Census Bureau, 2000

Ownership Units

The Local Area Low Income Housing Database, supplied by the NLIHC, reports that close to 70% of households in the Lowell, MA-NH PMSA own their own home. In 2000, less than 3% of these households were below the poverty level though close to a quarter of them spent more than 30% of their income on housing costs.

While these numbers are unclear at this point in time, it is anticipated that these numbers have increased due to the recent economic struggles of the country on the whole. The current recession has also caused housing prices to decrease after prices

had seen significant increases over the early-to-mid 2000's, as demonstrated in the tables below.

Median Single Family Sales Prices (1989-2009)

	Median Single Family Sales Prices (1989-2009)									
	Billerica	Chelmsford	Dracut	Dunstable	Groton	Lowell	Pepperell	Tewksbury	Tyngsboro	Westford
2009*	304,000	320,000	240,000	477,000	443,625	185,000	268,000	299,900	342,500	427,500
2008	305,000	325,000	263,000	441,500	400,000	194,900	292,000	319,450	328,000	420,000
2007	342,500	353,500	285,000	399,900	501,450	251,000	322,500	338,500	381,100	498,500
2006	345,000	370,000	305,000	478,500	465,000	265,000	322,500	365,000	388,750	465,000
2005	374,000	373,700	314,000	570,000	472,000	274,900	365,000	380,000	384,950	515,000
2004	356,250	355,000	295,500	414,300	455,000	252,250	339,900	354,450	365,000	464,000
1999	199,900	230,000	164,000	286,475	318,828	130,000	194,900	215,400	232,140	302,400
1994	141,750	165,150	123,125	179,950	213,750	89,000	150,350	155,000	159,950	225,000
1989	152,500	179,000	145,000	260,000	217,900	127,000	165,000	166,500	196,750	229,950
%Chng '05-09	-18.7%	-14.4%	-23.6%	-16.3%	-6.0%	-32.7%	-26.6%	-21.1%	-11.0%	-17.0%

Source: The Warren Group (www.thewarrengroup.com, March 2009)

* 2009 Data for Jan - Jun only

Median Condominium Sales Prices (1989-2009)

	Median Condominium Sales Prices (1989-2009)									
	Billerica	Chelmsford	Dracut	Dunstable	Groton	Lowell	Pepperell	Tewksbury	Tyngsboro	Westford
2009*	225,450	195,000	155,000	0	383,351	126,125	0	257,000	160,625	245,250
2008	244,900	218,500	165,500	0	217,500	155,900	181,000	280,000	185,000	289,000
2007	195,000	245,250	179,950	0	312,500	175,000	168,500	265,000	182,000	210,000
2006	270,000	250,000	190,000	0	337,500	202,000	249,000	285,000	222,000	340,000
2005	190,500	272,000	193,248	0	270,200	193,500	249,900	287,000	209,000	369,900
2004	167,000	255,000	176,500	0	263,000	165,950	190,000	273,450	181,000	369,900
1999	76,398	142,000	84,000	0	144,000	70,950	93,000	154,400	87,125	249,000
1994	42,000	104,000	66,000	0	132,000	39,500	65,750	103,500	67,500	245,963
1989	105,000	130,000	99,900	0	113,760	99,999	101,000	115,321	98,000	234,500
%Chng '05-09	18.3%	-28.3%	-19.8%	--	41.9%	-34.8%	--	-10.5%	-23.1%	-33.7%

Source: The Warren Group (www.thewarrengroup.com, March 2005)

* 2009 Data for Jan - Jun only

Despite a housing boom in the early 2000s, the last few years have seen a drop in both single family and condominium sales prices. The national foreclosure crisis coupled with high unemployment rates have significantly impacted the housing market. Despite these declines there has been some promise through the City's First-Time Home Buyer Program, which has helped generate interest in attracting new home buyers to Lowell.

A comparison of the Multiple Listing Service (MLS) property listings for Lowell in the last five years (table below) supports this data.

City of Lowell: MLS Property Listings

Property Type	Jan-10		Dec-04		% Change	
	No. of Listings	Med. List Price	No. of Listings	Med. List Price	No. of Listings	Med. List Price
Single Family	160	\$239,900	162	\$277,924	-1%	-14%
Multi Family	107	\$230,000	83	\$390,160	29%	-41%
Condominium	156	\$162,500	151	\$196,999	3%	-18%

Source: Coldwell Banker, www.newenglandmoves.com, Multiple Listing Service (MLS)

As the table above indicates, the condo market and single family market have seen little difference in the last five years, while there has been an increase in the listings for multi-family properties. The median sale prices have significantly decreased across the board, particularly in the multi-family market

As the table below illustrates, the typical Lowell owner-occupied household has consistently spent 20% or less of their income on housing in the past three years.

Lowell, MA-NH PMSA: % of Annual Income Spent on Housing

Year	AMI	Median Single-Family Housing Price	Interest Rate	% of Annual Income
2005	\$80,400	\$274,900	5.77%	22.80%
2006	\$81,600	\$265,000	6.21%	22.70%
2007	\$82,400	\$251,000	6.18%	21.22%
2008	\$84,800	\$194,900	6.07%	15.83%
2009	\$88,400	\$192,550	5.01%	13.35%
2010	tbd	\$150,000	5.14%	tbd

* 2010 Data is based on information for January only.

Source: HUD, Warren Group

E. HOUSING FOR PERSONS WITH DISABILITIES

The Lowell Housing Authority maintains approximately 50 accessible and adaptable rental units for disabled individuals. This number does not take into consideration any private accessible or adaptable housing units, group homes or human service agency facilities, or new units under construction. While the City's Department of Inspectional Services tracks building permits for residential alterations, there are no figures available to determine the number of permits issued specifically to adapt housing units to accommodate disabilities.

F. HOUSING FOR PERSONS WITH HIV/AIDS AND THEIR FAMILIES

According to the Massachusetts Department of Public Health there were 458 people living with HIV/AIDS in Lowell and 2,678 in Middlesex County in 2008. Lowell's HOPWA dollars support a number of public service programs including housing information services to assist individuals with HIV/AIDS and their families find decent affordable housing. Additionally, Cambridge Cares About AIDS, provides 16 SRO units for individuals with HIV/AIDS. The City also supports a number of programs

that provide Tenant Based Rental Assistance and Short Term Emergency Rental/Mortgage/Utility payments to households with HIV/AIDS throughout Middlesex County. Despite the number of programs supported in the county, the demand on these service providers is great.

2. ASSISTED HOUSING

M.G.L. Chapter 40B Subsidized Housing

Under Mass General Law Ch. 40B, Massachusetts Department of Housing and Community Development (DHCD) maintains inventories of affordable and subsidized housing in Massachusetts's communities. Ch. 40B establishes a goal that 10% of the housing stock in each community must be affordable and institutes an expedited development process for projects that include affordable housing in communities that fail to meet this requirement.

According to the latest inventory conducted by DHCD (March, 2008), more than 13% of Lowell's housing units qualify as affordable under Massachusetts General Law Chapter 40B. This figure is likely to increase through the creation of additional affordable housing units provided by the Julian D. Steele Reinvention and Replication Plans, described in the Housing section of this plan.

The table below includes the percentage of total housing units among communities in the Lowell, MA-NH SHI, which qualify as affordable under the M.G.L. Ch 40B inventory. Lowell greatly exceeds other communities in the SHI in terms of providing affordable housing.

Lowell, MA-NH SHI: Ch 40B Affordable Housing Inventory (2008)

	Billerica	Chelmsford	Dracut	Dunstable	Groton	Lowell	Pepperell	Tewksbury	Tyngsboro	Westford
% Ch 40B	6.10%	6.80%	5.80%	0.00%	5.80%	13.30%	3.10%	9.10%	7.70%	4.40%

Source: Department of Housing and Community Development
Chapter 40B Subsidized Housing Inventory (SHI) as of September 9, 2008*

Public Housing

Public housing remains one of the most important contributors of affordable housing for low-income residents. The City of Lowell has approximately 5,174 units of subsidized housing. There are currently 231 State-funded and 1,641 Federally-funded public housing units in Lowell, all of which are managed by the Lowell Housing Authority (LHA). The majority of public housing sites are located in neighborhoods that are well served by public transportation.

Section 8 Rental Assistance

The Lowell Housing Authority also manages 1,353 rental assistance certificates/vouchers (both State and Federal). In addition, there are regional non-profit housing agencies offering rental assistance, including Community Teamwork, Inc. (CTI), which is based in Lowell. CTI currently provides more than 2,000 Section 8 vouchers. CTI awards vouchers on a first-come, first-served basis from a waiting list provided by the state. The vast majority of these vouchers are used to rent apartments in Lowell.

Expiring Use

Among the subsidized housing units in Lowell, 1349 are currently at risk of losing their affordability status before 2015. The loss of these affordability restrictions limits the number of affordable units available to low-income and moderate-income households. Unless the property owners renew their Section 8 contracts or consent to extending their affordability agreement, these units may be sold or rented at market rate. Given the vulnerability of the current housing market it's unlikely that these property owners will allow these restrictions to lapse. In the event that they do, the City's housing office is notified.

City of Lowell: 2010 Subsidized Housing Inventory – Expiring Use

Property Name	Agency	Units at Risk - 2015	Affordability Expires
Centennial Island Apts	Private	117	2009
D'Youville Senior Care Center	HUD	22	2011
First Lowell Rehab	HUD	46	2012
Lowell Residence	HUD	6	2010
Lowell Sun	HUD	84	2010
Mazur Park Apartments	HUD	50	2010
River Place Towers	MHFA	449	
Townhouse of Lowell	HUD	96	2015
The Wentworth	HUD	40	2010
Three Gems	HUD	8	2009
Westminster Village Arms	MHFA	431	2012

Source: Mass. Department of Housing and Community Development

3. MARKET INFLUENCE ON USE OF AVAILABLE FUNDS

The characteristics of the housing market will significantly impact how the City will direct its housing funds over the next five years. Specifically, the City intends to focus its monies on homeownership units, and on low-income and moderate-income households.

With favorable interest rates and the comparatively low ownership rates relative to neighboring communities, the City of Lowell will continue to place greater importance on owner-occupancy. Homeownership provides households with an opportunity to build equity, and benefits the community by encouraging neighborhood stabilization.

The City also aims to direct its housing funds to moderate- and low-income households. The cost per unit subsidy required to support a moderate- or low-income household is less than that needed to support a very low-income household.

Because of this, more housing units can be created with extremely limited funds, especially in a struggling housing market.

Specific Housing Objectives (91.215 (b))

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve over a specified time period.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

3-5 Year Strategic Plan Specific Housing Objectives response:

1. SPECIFIC HOUSING OBJECTIVES

The following table outlines the specific accomplishment goals that the City of Lowell hopes to achieve over the 2010-2015 Consolidated Plan period.

ACTIVITY	ACCOMPLISHMENT UNITS	GOAL
Rental Housing Subsidies	04-Households	140
Construction of Housing	10-Housing Units	100
Direct Homeownership Assistance	04-Households	175
Rehab, Single-Unit Residential	10-Housing Units	75
Rehab, Multi-Unit Residential	10-Housing Units	50
Lead-Based/Lead Hazard Test/Abatement	10-Housing Units (Abated)	50
Homeownership Assistance (not direct)	01-People (Served)	400

In addition to meeting these accomplishment goals, the City hopes to be able to complete the 35 units remaining to meet Julian D. Steele Replication Plan mandates and achieve a measurable improvement in the rate of home ownership in the City. In order to reduce the operating costs of the housing units assisted and conserve energy, the City has embraced a policy of requiring that all housing projects supported by Consolidated Plan construction funding must meet Energy Star standards.

Finally, the City has placed a renewed emphasis on strengthening the capacity of Community Housing Development Organizations (CHDOs), as defined in 24 CFR Section 92.2, operating in Lowell. CHDOs will continue to be particularly instrumental in developing permanent housing to help reduce the chronically homeless population in the City and in developing affordable housing units consistent with the mandates of the Julian D. Steele Replication Plan. As of March 2010, there are four certified CHDOS operating in Lowell. The City hopes to see this number increase over the next five years.

2. USE OF RESOURCES

Assuming continued level funding of the HOME and CDBG programs, the City of Lowell expects to spend approximately \$9.1 million of HOME and CDBG funds on affordable housing projects between July 2010 and June 2015. It is anticipated that approximately \$5 million of this will be spent on homeownership projects and the balance will be applied to rental projects.

Based on prior project experience, we anticipate that these funds will be matched at a rate of 3:1 or 4:1 with other public and private funding, including:

- Lead Hazard Control Grant
- Continued funding of permanent housing projects through the McKinney program
- Contributions of HOME funding through the Massachusetts Department of Housing and Community Development to Lowell projects
- Project-based Section 8 certificates through the Lowell Housing Authority
- Low Income Housing Tax Credits
- Historic Preservation Tax Credits
- Project financing at favorable interest rates from the Lowell Development and Finance Corporation and local lenders
- Private contributions to local CHDOs
- Private market real estate investments by local CHDOs
- Market rate housing that subsidizes affordable units on the same development site

Needs of Public Housing (91.210 (b))

In cooperation with the public housing agency or agencies located within its boundaries, describe the needs of public housing, including the number of public housing units in the jurisdiction, the physical condition of such units, the restoration and revitalization needs of public housing projects within the jurisdiction, and other factors, including the number of families on public housing and tenant-based waiting lists and results from the Section 504 needs assessment of public housing projects located within its boundaries (i.e. assessment of needs of tenants and applicants on waiting list for accessible units as required by 24 CFR 8.25). The public housing agency and jurisdiction can use the optional Priority Public Housing Needs Table (formerly Table 4) of the Consolidated Plan to identify priority public housing needs to assist in this process.

3-5 Year Strategic Plan Needs of Public Housing response:

The Lowell Housing Authority completed its 5-Year Plan in 2010. A copy of this document is available on their website at www.lhma.org.

SUMMARY OF PUBLIC HOUSING

Occupied Housing Units

There are currently 231 State and 1,641 Federal public housing units in Lowell, all of which are managed by the Lowell Housing Authority (LHA). LHA's housing units are divided almost equally among housing for families and housing for the elderly. As was discussed in previous sections, these sites are located in neighborhoods in close proximity to public transportation, commercial opportunities, and social services.

Section 504 Needs Assessment

The Lowell Housing Authority completed its Section 504 assessment in July 1994, to determine how the LHA can best comply with HUD's handicapped requirements. The assessment was based on a variety of factors including the LHA's waiting list for accessible units. The report concluded that there was a need for less than 5% of all Federal units to be accessible for handicapped residents. Currently, of the 1893 units of public housing in the jurisdiction, approximately 4% are accessible for handicapped households.

Characteristics of Families on Waiting Lists

There are 3,583 families on the LHA waiting list for public housing and an additional 3,721 families on the waiting list for Section 8 vouchers. According to the LHA, 90% of these families have an income of less than or equal to 30% of the area's median income; and the majority of households have children. The majority of families on both the public housing and Section 8 waiting lists are Hispanic (42%) and White (38%).

Federal public housing waiting lists are open. Applications for State public housing are accepted for emergencies only and the Section 8 wait list is currently closed.

In order to effectively and efficiently accommodate those on its waiting list, the Lowell Housing Authority developed the following preference system to rank those seeking housing.

Lowell Housing Authority Preference System

Preference Description	
#	
1	A person/household involuntarily displaced from a dwelling unit in the municipality of Lowell by natural disaster, by fire, by unwarranted landlord action or by Government action, including capital programs of the LHA.
2	A working head of household or working spouse (who has averaged 20 hours of work a week for at least six months), or a person 62 years or older, or a person unable to work because of the extent of his/her disability.
3	A legal resident of Lowell, or a person working in Lowell an average of 20 hours a week or more, or a person with a job offer to work in Lowell with a minimum of 20 hours of work a week.
4	A victim of domestic violence who has been relocated as verified by the police.
5	A veteran as verified by the Department of Veteran Affairs.

Source: Lowell Housing Authority

Physical Condition of Public Housing

It is the policy of the LHA to inspect each unit at least once per year. Emergency deficiencies found during the inspection are corrected within 24 hours; routine deficiencies are addressed within two weeks. The 2009 LHA Plan included more than \$3 million in repairs and upgrades to LHA properties is during the plan year including site improvements and upgrades to dwelling equipment.

Housing units which have occupancy permits are considered by the City Inspectional Services to be in standard condition. According to LHA, there are currently no substandard public housing units in Lowell. To ensure that existing units remain in standard condition, each housing unit is inspected for code compliance during the turnover process, before being rented to a new household.

Restoration and Revitalization needs

HUD requires public housing authorities to prepare an annual Performance and Evaluation Report, detailing the progress made by the agency in meeting its modernization goals and activities planned for the future. According to summaries of the Performance and Evaluation Reports of the past five years, LHA has dedicated many of its resources to upgrading units throughout its jurisdiction, including the renovations of kitchens and bathrooms, roof replacements, replacement of dwelling equipment (stoves, refrigerators, air conditioning), and general outdoor site improvements

Public Housing Strategy (91.210)

1. Describe the public housing agency's strategy to serve the needs of extremely low-income, low-income, and moderate-income families residing in the jurisdiction served by the public housing agency (including families on the public housing and section 8 tenant-based waiting list), the public housing agency's strategy for addressing the revitalization and restoration needs of public housing projects within the jurisdiction and improving the management and operation of such public housing, and the public housing agency's strategy for improving the living environment of extremely low-income, low-income, and moderate families residing in public housing.
2. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake to encourage public housing residents to become more involved in management and participate in homeownership. (NAHA Sec. 105 (b)(11) and (91.215 (k))
3. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation. (NAHA Sec. 105 (g))

3-5 Year Strategic Plan Public Housing Strategy response:

The Lowell Housing Authority completed its 5-Year Plan in 2010. A copy of this document is available on their website at www.lhma.org.

1. ADDRESSING PUBLIC HOUSING NEEDS

ADDRESSING THE NEEDS OF LHA RESIDENTS

The LHA works on a regional level to address the needs of extremely low-income, low-income, and moderate-income families. Expansion of its Section 8 Homeownership program is one activity in particular which the authority hopes will help assist households throughout Greater Lowell. In an effort to offer its tenants more than just affordable housing, LHA provides a variety of social, educational, and recreational activities including youth programs, employment training, and field trips for the elderly. LHA continues to promote partnerships with local organizations to provide quality services to its tenants.

ADDRESSING REVITALIZATION AND RESTORATION NEEDS

According to the LHA, improvements to the individual housing developments, elevator upgrades, and upgrades to dwelling equipment are among the priority citywide projects. Upgrades to sprinkler systems, sidewalks and parking, and heating systems are additional projects planned over the next five years. The LHA has budgeted approximately \$3 million for each year to achieve these goals.

Additionally, the Julian D. Steele Housing Development, a State-funded family public housing development, will be replaced with 180 new units. All tenants have been relocated and the buildings demolished. A combination of single-family units and duplexes with project-based Section 8 subsidies are planned for the 20-acre site.

IMPROVING THE LIVING ENVIRONMENT OF LHA RESIDENTS

The Lowell Housing Authority offers programs and activities which help improve the living environment for low-income and moderate-income families living in public housing. These activities are summarized below:

Youth Activities Program

The Lowell Housing Authority offers many activities for the children who live in their properties. These programs offer recreational and sports opportunities to at-risk youth and provide a health alternative to the use of drugs, alcohol and gangs. Activities are provided after school, evenings, weekends, and during school vacations to youth ages 5-18.

Family Resource Parenting Program

Provided in partnership with staff at Casey Family Services, the FRP offers services that include child and youth development, family support, and advocacy. Parent education and support groups are held that focus on parent/child communication, cultural strengths and differences, conflict resolution skills.

Supportive Living Services Program

Over the past three years, supportive services have been provided through LHA, which encourage elderly/disabled residents to participate in social activities including on-site cafes, health screenings, field trips, and educational programs, improving their overall life experiences.

2. LHA RESIDENT PARTICIPATION

In an effort to address the needs of public housing, the Lowell Housing Authority offers its residents opportunities to become involved in LHA management and policy implementation. LHA also provides a variety of activities aimed at self-sufficiency and homeownership among its residents. These programs are described below:

Community Service Requirements

A requirement of the residential lease signed by all public housing residents of LHA is to participate in the Community Service Program. As part of the program, non-exempt residents are mandated to contribute eight hours per month of community service, participate in eight hours per month of economic self-sufficiency activity, or a combination of the two. Service opportunities include volunteering in a local school, hospital, child care center, working with youth organizations, and improving the physical environment through participation in outdoor programs.

Family Self-Sufficiency Program

The Family Self-Sufficiency Program is designed to foster a holistic approach to self-sufficiency. The FSS Section 8 program recently expanded to include 50 participants and in the past two years three graduates of the FSS program have utilized the program to purchase homes. Other services provided through the program include: resume development and interviewing techniques, computer training, day care placements, First Time Homebuyers Program, and credit repair/credit establishment.

Homeownership Program

The Homeownership Program provides residents who are interested in owning their own home with the education and support needed to become financially

capable of purchasing their own home. Residents are carefully directed through the process of becoming qualified for mortgage financing, finding a prospective home for purchase, the home inspection process, and other details needed to eventually own and move into their own home.

Barriers to Affordable Housing (91.210 (e) and 91.215 (f))

1. Explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction. Such policies include tax policy affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment.
2. Describe the strategy to remove or ameliorate negative effects of public policies that serve as barriers to affordable housing, except that, if a State requires a unit of general local government to submit a regulatory barrier assessment that is substantially equivalent to the information required under this part, as determined by HUD, the unit of general local government may submit that assessment to HUD and it shall be considered to have complied with this requirement.

3-5 Year Strategic Plan Barriers to Affordable Housing response:

1. PUBLIC POLICIES IMPACTING THE COST OF HOUSING

Lowell is part of the Greater Boston housing market which has been well-documented as one of the most expensive in the country. The National Low-Income Housing Coalition recently released a study which identified Massachusetts as having the second least affordable rental housing in the nation. The costs of real estate, construction, and homeownership in Eastern Massachusetts all also rank among the highest in the country.

The reasons for the high cost of housing in this area are diverse and complex, but many researchers have identified tax policies and land use regulations as contributing factors. The ability of Massachusetts cities and towns to raise local revenues is restricted by the Proposition 2 ½ property tax regulations. These regulations limit the rate of growth of local tax levies and discourage communities from accepting additional housing development because of real and perceived fiscal impacts on municipal budgets. Partially in response to the restrictions of Proposition 2 ½, many municipalities in Massachusetts have enacted strict zoning and other land-use regulations which significantly limit the available development opportunities for low-cost housing in general and multi-family housing specifically, thereby increasing the costs of producing affordable housing in the region.

2. STRATEGY TO AMELIORATE BARRIERS

Relative to other communities within the Greater Boston housing market, Lowell minimizes these barriers. Property costs in Lowell, although increasing rapidly with the overall market, remain lower than those of all of its neighboring towns and most communities in the region. Property taxes are comparatively low and, due in part to the historic diversification of land uses, Lowell is less restricted by Proposition 2 ½ than many of its neighbors.

Nevertheless, the cost of affordable housing production remains extremely high in the Lowell market. As a result, the City of Lowell continues to work to eliminate barriers that may limit the production or feasibility of affordable housing construction that are within the capacity of local government to address. Foremost among these

are zoning and land-use regulations. In December of 2004, the Lowell City Council adopted a comprehensive reform of the City's zoning regulations, consistent with the 2003 Master Plan.

Under the new zoning, over thirty-eight percent (38%) of the City's land area is zoned to allow multi-family development in residential or mixed-use zoning districts. The City allows significant density in these zones as described below. Even the most restrictive single-family zone allows more than four units per acre. In addition, the City's Zoning Ordinance allows for accessory dwelling units in single-family zoned areas and encourages the conversion of existing buildings including schools, churches, and obsolete industrial buildings, to multi-family residential uses, even when those buildings are located in single-family zoning districts. In certain urban mixed-use zoning districts, required parking is limited to one space per unit and a by-right waiver for all required parking is provided if the project site is within 1500 feet of a public parking structure.

Maximum Allowable Residential Densities in Lowell Zoning Districts

Zoning District(s)	Proportion of Land Area	Units per Acre
Suburban Multifamily (SMF), Suburban Mixed Use (SMU), & Traditional Two-Family (TTF)	18%	14.5
Traditional Multifamily (TMF), Traditional Mixed Use (TMU), & Neighborhood Business (NB)	9%	17
Urban Multifamily (UMF) & Urban Mixed Use (UMU)	3%	43.5
Downtown Mixed Use (DMU), High Rise Commercial (HRC), and Institutional (INST)	8%	60-120*

Source: City of Lowell Zoning Code

*Limited only by floor area ratios.

Lowell's permit fees and development review process are also some of the least burdensome in the region. The City does not charge development impact fees or technical review fees that are allowed under Massachusetts General Law and places no special permitting reviews on affordable housing projects that would not be required of all developments.

In recent years, the Lowell Planning Board approved the Rivers Edge subdivision as a planned residential development. This step enabled the project to reduce lot area, setbacks, and frontage requirements as well as minimize the infrastructure costs by clustering the building lots with shorter utility runs and roadways, while providing communal open space resources for the residents of this mixed income project. The development of this project is expected to be completed during the 2010-2015 Consolidated Plan period.

The Hamilton Canal District (HCD) Form-Based Code was adopted in February of 2009 and the Subdivision Regulations were amended in January 2009 to accommodate the redevelopment of 14.5 acres underutilized vacant and industrial land directly adjacent to downtown Lowell. The HCD is expected to transform current underutilized industrial land into over 2 million square feet of mixed-use development directly south of Lowell's downtown and will be within walking distance to the Gallagher multi-modal transit center. The District expands housing opportunities as residential development is expected to be a substantial component of the project's build-out, providing units in a district that currently does not provide

any housing. Through significant public participation the community expressed interest in the developer providing subsidized, workforce type housing. The first project permitted in the District will provide 130 affordable units at or below 80% AMI.

During the 2006-2008 fiscal years, alone, Lowell issued building permits for 457 new units of multi-family housing citywide. In the past five years there have been over 700 residential units constructed through the adaptive reuse of existing buildings located in downtown, a number of which are affordable to families earning 80% of the area median income or less. 325 additional units have been permitted in downtown, with a number of them currently under construction. Of these 325 units over 150 of them will be affordable to households earning 80% of the area median income (AMI) or less.

Additional steps that the City has taken to remove impediments to affordable housing include streamlining the permitting process, and utilizing Massachusetts programs to incentivize production of affordable housing units. For example the City Council voted to designate several parcels in and around the Hamilton Canal District as "priority Development Sites" under the provision of M.G. L. Chapter 43D. This guarantees that projects proposed in the Priority Development sites will be permitted within 180 days of application submission, adding greater certainty and significantly reducing carrying costs for developers.

To encourage redevelopment of an underutilized mill building, and incent private development of affordable housing units the City adopted the Lowell Downtown Smart Growth Overlay district under M.G.L Chapter 40R. The property located at 31, 31.1, 31.2 Jackson Street is included in the overlay district and has been approved for 101 residential units, of which 20% are required to be affordable to residents with 80% or less AMI, and will include commercial uses as well.

In summary, while the cost of housing development remains a major impediment to affordable housing production, the City of Lowell has taken significant steps to minimize the role that public policies at the local level have in exacerbating this challenge. As stated in the City's Master Plan, Lowell also actively supports statewide efforts to encourage other communities to expand their housing production, recognizing that the overall market forces associated with an increase in regional housing supply will improve housing affordability in Lowell.

HOMELESS

Homeless Needs (91.205 (b) and 91.215 (c))

*Please also refer to the Homeless Needs Table in the Needs.xls workbook

Homeless Needs— The jurisdiction must provide a concise summary of the nature and extent of homelessness in the jurisdiction, (including rural homelessness and chronic homelessness where applicable), addressing separately the need for facilities and services for homeless persons and homeless families with children, both sheltered and unsheltered, and homeless subpopulations, in accordance with Table 1A. The summary must include the characteristics and needs of low-income individuals and children, (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered. In addition, to the extent information is available, the plan must include a description of the nature and extent of homelessness by racial and ethnic group. A quantitative analysis is not required. If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates.

3-5 Year Strategic Plan Homeless Needs response:

1. HOMELESS NEEDS

A point-in-time count of the homeless population in Lowell was conducted in January 2009. The 2009 Homeless Census was performed using HUD-recommended protocols for counting the number of persons who are homeless at a particular point in time. The Census has four components: (1) Street Count; (2) Shelter, Institution, and Hotel/Motel Count; (3) Transitional Housing Count; and (4) Permanent Supportive Housing Count. Data was gathered for almost every individual, family head of household and unaccompanied youth through individual interviews, HMIS and client files.

This enumeration identified 309 homeless persons (163 persons in families with children), including both sheltered and unsheltered populations. Of these, 36 were identified as chronically homeless.

The table below outlines those identified by this survey.

Part 1: Homeless Population		Sheltered		Unsheltered	Total
	Emergency	Transitional			
Number of Families with Children (Family Households):	12	44	0		56
1. Number of Persons in Families with Children	31	115	0		146
2. Number of Single Individuals and Persons in Households without children	32	120	11		163
(Add Lines Numbered 1 & 2 Total Persons)	63	235	11		309
Part 2: Homeless Subpopulations		Sheltered		Unsheltered	Total
a. Chronically Homeless		34		2	36
b. Seriously Mentally Ill		52			
c. Chronic Substance Abuse		43			
d. Veterans		58			
e. Persons with HIV/AIDS		1			
f. Victims of Domestic Abuse		45			
g. Unaccompanied Youth (Under 18)		1			

The following table (consistent with HUD Table 1A) outline the physical shelter and housing resources available to assist the homeless and formerly-homeless in Lowell. The tables also show the gaps between those resources and the needs in the community.

		Current Inventory	Under Development	Unmet Need/Gap
Individuals				
Beds	Emergency Shelter	30	0	0
	Transitional Housing	114	0	0
	Permanent Supportive Housing	127	0	60
	Total	271	0	60
Persons in Families With Children				
Beds	Emergency Shelter	173	0	0
	Transitional Housing	157	0	0
	Permanent Supportive Housing	65	0	120
	Total	395	0	120

Priority Homeless Needs

1. Using the results of the Continuum of Care planning process, identify the jurisdiction's homeless and homeless prevention priorities specified in Table 1A, the Homeless and Special Needs Populations Chart. The description of the jurisdiction's choice of priority needs and allocation priorities must be based on reliable data meeting HUD standards and should reflect the required consultation with homeless assistance providers, homeless persons, and other concerned citizens regarding the needs of homeless families with children and individuals. The jurisdiction must provide an analysis of how the needs of each category of residents provided the basis for determining the relative priority of each priority homeless need category. A separate brief narrative should be directed to addressing gaps in services and housing for the sheltered and unsheltered chronic homeless.
2. A community should give a high priority to chronically homeless persons, where the jurisdiction identifies sheltered and unsheltered chronic homeless persons in its Homeless Needs Table - Homeless Populations and Subpopulations.

3-5 Year Strategic Plan Priority Homeless Needs response:

1. PRIORITY HOMELESS NEEDS

The table below outlines the relative priorities of various categories of homeless needs within the Continuum of Care for consolidated plan program funding. Categories identified as "High" priorities are those for which funding will be provided over the next five years for the support of existing initiatives and programs as well as for new projects. Categories noted as "Medium" priorities will be funded to maintain and continue existing operations, but funds may not be available for new projects or programs to address these needs. All ratings and funding plans are based on the assumption of level funding of all consolidated plan programs over the next five years.

HOUSING CONTINUUM CATEGORY	INDIVIDUALS	FAMILIES	FUNDING SOURCE
Emergency Shelter	MEDIUM	MEDIUM	ESG, CDBG
Transitional Housing	MEDIUM	MEDIUM	ESG, CDBG, HOPWA
Permanent Supportive Housing	HIGH	HIGH	HOME, HOPWA
Chronically Homeless	HIGH	HIGH	ESG, CDBG, HOME

The City adopted a 10-Year Plan to End Homelessness in April 2010. This document, created in collaboration with members of Lowell's business and non-profit community, government, educational, and faith-based institutions, as well as Lowell Continuum of Care members addresses HUD's major objectives to end chronic homelessness and move families and individuals to permanent housing; to monitor and evaluate program performance; identify gaps and needs within the system and coordinate a plan to address them; and replicate existing and new innovative programs and best practices that can get and keep people housed.

The jurisdiction is also working with recipients of Homelessness Prevention and Rapid Re-Housing Program funds to help prevent individuals and families from becoming homeless and to rapidly re-house those who, with short term assistance, can become self-sufficient and maintain stable housing. In addition, an early warning system is under development through the SHIFT program and Commonwealth of Massachusetts to help prevent individuals and families from becoming homeless. The Early Warning System will work with utility, banking and property managers to encourage them to contact SHIFT program representatives when residents/customers are in danger of defaulting on mortgage/rental and/or utility charges. In this way, SHIFT case managers and financial agents can work with individuals and families to help stabilize their risk of becoming homeless and keep them in their homes. The coordination of HPRP funds along with support of the SHIFT program are also high priorities of the jurisdiction.

Process Basis for Developing and Determining Relative Priorities

The City of Lowell Continuum of Care planning and project selection process established priority homeless needs identified in this plan. This process included public notice of solicitations for project proposals and needs. A community-based advisory committee using objective rating and review criteria established by HUD for the Continuum of Care reviewed submitted proposals. The ten-member committee currently includes representatives from the Lowell Small Business Assistance Center, Regional Interfaith Leadership Alliance, Greater Lowell Chamber of Commerce, Lowell Community Health Center, Downtown Lowell Business Association, the City of Lowell, Paul Fireman Fund, Lowell National Historical Park, Merrimack Valley Housing Partnership, and the Mental Health Association of Greater Lowell.

The largest gaps between currently available services and needs identified through the Continuum of Care outreach and planning efforts are in the area of permanent supportive housing. This category is therefore a top priority for supporting new initiatives. The Continuum of Care planning observed that existing facilities generally meet the identified needs for emergency shelter and transitional housing. However, if the existing facilities do not continue to receive support through the Consolidated Plan programs, there is a danger that services may be reduced below the needs in these areas as well.

2. CHRONIC HOMELESSNESS

As part of a larger initiative to end chronic homelessness within 10 years, Lowell has given high priority to developing permanent supportive housing for chronically homeless individuals. Two of the jurisdictions' four federally funded, Supportive Housing Program sponsors are targeted to chronically homeless persons with disabilities.

Homeless Inventory (91.210 (c))

The jurisdiction shall provide a concise summary of the existing facilities and services (including a brief inventory) that assist homeless persons and families with children and subpopulations identified in Table 1A. These include outreach and assessment, emergency shelters and services, transitional housing, permanent supportive housing, access to permanent housing, and activities to prevent low-income individuals and families with children (especially extremely low-income) from becoming homeless. The jurisdiction can use the optional Continuum of Care Housing Activity Chart and Service Activity Chart to meet this requirement.

3-5 Year Strategic Plan Homeless Inventory response:

1. HOMELESS INVENTORY

The tables below document the inventory of facilities and services available to assist homeless individuals and families with children as identified above. The tables include data for emergency shelter, transitional housing, and permanent housing. Please note that the information in these charts reflects Lowell's 2009 Point-in-Time count and Housing Inventory Chart. HMIS and Target Population Key are identified in the boxes below.

*** HMIS Participation Code:**

PA: Client level data in HMIS on at least 75% of the homeless persons served.

PS: Client level data in HMIS less than 75% of the homeless population served.

N: Not yet providing client level data to HMIS

DV: Domestic violence served providers.

***Target Population Key:**

HC: Households with children

SF: Single Female

SFHC: Single female households with children

SMF: Single male and female

SMF + HC: Single male and female + households with children

City of Lowell , Massachusetts CoC Housing Inventory Charts

Emergency Shelter: Fundamental Components in CoC System – Housing Inventory Chart													
Provider Name	Facility Name* *Place an asterisk after the facility name if it receives HUD McKinney-Vento dollars.	HMIS Part. Code	Number of Year-Round Beds in HMIS		Geo Code <input checked="" type="checkbox"/>	Target Pop		Year-Round			Total Year-Round Beds	Other Beds	
						A	B	Fam. Units	Fam. Beds	Ind. Beds		Seasonal	O/V*
Current Inventory (Available for Occupancy on or before Jan. 31, 2010)			Ind.	Fam.									
Lowell Transitional Living Center	Lowell Transitional Living Center*	PA	0	0	251284	SMF		0	0	0	0	35	0
Community Teamwork, Inc.	Milly’s Place	PA	0	21	251284	SFHC		7	21	0	21	0	0
Community Teamwork, Inc.	Merrimack House	PA	0	21	251284	SFHC		7	21	0	21	0	0
Community Teamwork, Inc.	Scattered-Site	PA	0	173	251284	SFHC		49	173	0	173	0	0
SUBTOTALS:			0	215	SUBTOTAL CURRENT INVENTORY:			63	215	0	215	35	0
New Inventory in Place in 2009 (Available November 1, 2009-)													
Community Teamwork, Inc.	Scattered Site	PA	0	173	251284	SFHC		49	173	0	173	0	0
No Inventory Under Development													
Unmet Need					UNMET NEED TOTALS:			0		0	0	0	0
Emergency Shelter: Fundamental Components in CoC System – Housing Inventory Chart													
Total Year-Round Beds—Individuals					Total Year-Round Beds—Families								
1. Total Year-Round Individual Emergency Shelter (ES) Beds:					0	6. Total Year-Round Family Emergency Shelter (ES) Beds:					215		
2. Number of DV Year-Round Individual ES Beds:					0	7. Number of DV Year-Round Family ES Beds:					0		
3. Subtotal, non-DV Year-Round Individual ES Beds (Line 1 minus Line 2):					0	8. Subtotal, non-DV Year-Round Family ES Beds (Line 6 minus Line 7):					215		
4. Total Year-Round Individual ES Beds in HMIS:					0	9. Total Year-Round Family ES Beds in HMIS					215		
5. HMIS Coverage—Individual ES Beds (Divide Line 4 by Line 3 and multiply by 100. Round to a whole number):					0	10. HMIS Coverage—Family ES Beds (Divide Line 9 by Line 8 and multiply by 100. Round to a whole number):					100 %		
*In the column labeled “O/V,” enter the number of Overflow and Voucher Beds													

*In the column labeled "O/V," enter the number of Overflow and Voucher Beds

Transitional Housing: Fundamental Components in CoC System – Housing Inventory Chart												
Provider Name	Facility Name*	HMIS Part. Code	Number of Year-Round Beds in HMIS		Geo Code ☒	Target Pop		Year-Round			Total Year-Round Beds	
	*Place an asterisk after the facility name if it receives HUD McKinney-Vento dollars.					A	B	Fam. Units	Fam. Beds	Ind. Beds		
Current Inventory (Available for Occupancy on or before January 31, 2010)			Ind.	Fam.								
Alternative House	Mary Rita House*	DV	6	23	251284	SF & SFCH	DV	9	23	6	29	
Community Teamwork, Inc.	SSTAP	DV	0	44	251284	SFHC	DV	14	44	0	44	
House of Hope, Inc.	House of Hope, Inc.*	PA	0	43	251284	SFHC		18	43	0	43	
House of Hope, Inc.	H2O	PA	0	15	251284	SFHC		5	15	0	15	
Lowell Housing Authority	Transitional Housing	PA	0	32	251284	SFHC		12	32	0	32	
Lowell Transitional Living Center	Transitional Housing*	PA	90	0	251284	SMF		0	0	90	90	
US Dept. of Veteran’s Affairs	Crescent House	N	35	0	251284	SM	VET	0	0	35	35	
SUBTOTALS:			131	157	SUBTOTAL CURRENT INVENTORY:			58	157	131	288	
No New Inventory in Place in 2009												
No Inventory Under Development												
Unmet Need							UNMET NEED TOTALS:		0	0	0	0

Transitional Housing: Fundamental Components in CoC System – Housing Inventory Chart			
Total Year-Round Beds—Individuals		Total Year-Round Beds—Families	
1. Total Year-Round Individual Transitional Housing Beds:	131	6. Total Year-Round Family Transitional Housing Beds:	157
2. Number of DV Year-Round Individual TH Beds:	6	7. Number of DV Year-Round Family TH Beds:	67
3. Subtotal, non-DV Year-Round Individual TH Beds (Line 1 minus Line 2):	125	8. Subtotal, non-DV Year-Round Family TH Beds (Line 6 minus Line 7):	90
4. Total Year-Round Individual TH Beds in HMIS:	125	9. Total Year-Round Family TH Beds in HMIS:	90
5. HMIS Coverage—Individual TH Beds (Divide Line 4 by Line 3 and multiply by 100. Round to a whole number):	100%	10. HMIS Coverage—Family TH Beds (Divide Line 9 by Line 8 and multiply by 100. Round to a whole number):	100%

Permanent Supportive Housing*: Fundamental Components in CoC System – Housing Inventory Chart											
Provider Name	Facility Name *Place an asterisk after the facility name if it receives HUD McKinney-Vento dollars.	HMIS Part. Code	Number of Year-Round Beds in HMIS		Geo Code ☒	Target Pop.		Year-Round			Total Year-Round Beds
						A	B	Fam. Units	Fam. Beds	Ind/CH Beds	
Current Inventory (Available for Occupancy on or before January 31, 2010)			Ind.	Fam.							
Alternative House	Alternative House Apartments	DV	0	15	251284	HC		6	15	0	15
American Training	Choices for Living	N	24	0	251284	SMF		0	0	24	24
Bridgewell, Inc.	Pathfinder Apartments	PA	12	0	251284	SMF		0	0	12	12
Bridgewell, Inc.	Pathfinder PSH*	PA	12	0	251284	SMF		0	0	12	12
Eliot Community Human Services	Columbus Ave. & Scattered Sites	PA	31	0	251284	SMF		0	0	31	31
House of Hope Housing, Inc.	New Hope Apartments	PA	0	38	251284	SFHC		10	38	0	38
House of Hope Housing, Inc.	172 Lakeview Avenue	PA	0	9	251284	SFHC		3	9	0	9
House of Hope Housing, Inc.	179 Salem Street	PA	0	3	251284	SFHC		1	3	0	3
Institute for Health and Recovery	HEAL (Formerly Julie House)	PA	12	0	251284	SMF	HIV	0	0	12	12
Lowell Transitional Living Center	LTLC Apartments	PA	12	0	251284	SMF		0	0	12	12
Mental Health Association of Greater Lowell	MHA Supportive Housing I	PA	22	0	251284	SMF		0	0	22	22
Mental Health Association of Greater Lowell	MHA Supportive Housing II	PA	6	0	251284	SMF		0	0	6	6
SUBTOTALS:			131	65	SUBTOTAL CURRENT INVENTORY			20	65	131	196

Permanent Supportive Housing*: Fundamental Components in CoC System – Housing Inventory Chart											
New Inventory in Place in 2010 (Available for Occupancy November 1, 2009 –)			Ind.	Fam.							
Bridgewell, Inc.	Pathfinder Apartments	PA	12	0	251284	SMF		0	0	12	12
SUBTOTALS:			12	0	SUBTOTAL NEW INVENTORY:			0	0	12	12
No Inventory Under Development (Available for Occupancy N/A)											
Unmet Need								UNMET NEED TOTALS:			
								120	50	60	180
Total Year-Round Beds—Individuals				Total Year-Round Beds—Families							
1. Total Year-Round Individual Permanent Housing Beds:			131	6. Total Year-Round Family Permanent Housing Beds:			65				
2. Number of DV Year-Round Individual PH Beds:			0	7. Number of DV Year-Round Family PH Beds:			0				
3. Subtotal, non-DV Year-Round Individual PH Beds (Line 1 minus Line 2):			131	8. Subtotal, non-DV Year-Round Family PH Beds (Line 6 minus Line 7):			65				
4. Total Year-Round Individual PH Beds in HMIS:			131	9. Total Year-Round Family PH Beds in HMIS			65				
5. HMIS Coverage—Individual PH Beds (Divide Line 4 by Line 3 and multiply by 100. Round to a whole number):			100%	10. HMIS Coverage—Family PH Beds (Divide Line 9 by Line 8 and multiply by 100. Round to a whole number):			100%				

City of Lowell, Massachusetts Overall Census Results for 2010, 2009 and 2008: Point-in-Time Comparison

	Number of Homeless Persons		
	2010	2009	2008
Total Number of Person on One Night (Point-in-Time)	482	309	398

City of Lowell, Massachusetts Subpopulation Census Results for 2009 and 2008:
Point-in-Time Comparison

In comparing the 2009 PIT count to 2008, it would seem that the city of Lowell experienced a 23% decrease in the sheltered homeless population with the count falling from 390 in 2008 to 298 in 2009. However at that time HUD regulations required the reclassification of several programs from transitional housing programs to group and/or recovery homes, deleting 42 people/beds from the count and resulting in an actual 12% decrease in the sheltered homeless population. However as the nation entered a deep economic recession, Lowell's 2009 PIT count compared to 2010 reflected a major increase in the sheltered homeless population from 298 in 2009 to 482 in 2010. Nevertheless we believe that the numbers would have been much higher, without the availability funding provided by the American Recovery and Reinvestment Act's Homeless Prevention and Rapid Rehousing funds and those provided by the Massachusetts Regional Initiative in End Homelessness. These funds coupled with the determined efforts of Lowell's non-profit and for-profit landlords and service providers, state, local and regional government agencies prevented and rapidly re-housed hundred of people in danger of becoming homelessness.

Census Categories	Point-in-Time Results		
	2010	2009	2008
TOTAL ALL HOMELESS	482	309	398
ALL Sheltered	452	298	390
ALL Unsheltered	33	11	8
ALL Individuals	168	163	308
ALL Persons in Families	314	164	190
ALL Children	195	108	139
Gender All Adults (Individuals and families head of household)			
Men	139	135	140
Women	125	28	68
Households with Children			
FAM with Children, Single Head of Household*	99	56	71
FAM with Children, Two Parent Household*	20	0	2
All Age			
0-5	116	26	78
6-10	42	25	28
11-17	36	12	9
18-24	59	58	24
25-30	57	24	81
31-40	56	39	55
41-50	60	41	44
51-60	43	24	71
61-70	3	21	7
71+	3	0	1
Refused or Did not know	7	39	0
Special Populations			
Veterans	42	53	42
Chronically Homeless*	36	49	84
Mentally Ill*	128	62	91
Substance Abuse*	93	36	83
People with HIV/AIDS	0	2	4
Victims of Domestic Abuse	66	81	47
Unaccompanied Youth*	Unavailable	1	18
Refused or Did not know	12	39	2
Race (Adults only)			
American Indian or Alaska Native	3	2	3
Asian	11	6	7
Black/African American	35	33	39
Native Hawaiian Islander or Other Pacific Islander	1	0	0
White	196	122	211
Refused or Did not know	30	42	14
Ethnicity (Adults only)			
Non-Hispanic/Non-Latino	180	162	206
Hispanic/Latino	75	20	57
Refused or Did not know	12	37	16

Homeless Strategic Plan (91.215 (c))

1. Homelessness— Describe the jurisdiction's strategy for developing a system to address homelessness and the priority needs of homeless persons and families (including the subpopulations identified in the needs section). The jurisdiction's strategy must consider the housing and supportive services needed in each stage of the process which includes preventing homelessness, outreach/assessment, emergency shelters and services, transitional housing, and helping homeless persons (especially any persons that are chronically homeless) make the transition to permanent housing and independent living. The jurisdiction must also describe its strategy for helping extremely low- and low-income individuals and families who are at imminent risk of becoming homeless.
2. Chronic homelessness—Describe the jurisdiction's strategy for eliminating chronic homelessness by 2012. This should include the strategy for helping homeless persons make the transition to permanent housing and independent living. This strategy should, to the maximum extent feasible, be coordinated with the strategy presented Exhibit 1 of the Continuum of Care (CoC) application and any other strategy or plan to eliminate chronic homelessness. Also describe, in a narrative, relationships and efforts to coordinate the Conplan, CoC, and any other strategy or plan to address chronic homelessness.
3. Homelessness Prevention—Describe the jurisdiction's strategy to help prevent homelessness for individuals and families with children who are at imminent risk of becoming homeless.
4. Institutional Structure—Briefly describe the institutional structure, including private industry, non-profit organizations, and public institutions, through which the jurisdiction will carry out its homelessness strategy.
5. Discharge Coordination Policy—Every jurisdiction receiving McKinney-Vento Homeless Assistance Act Emergency Shelter Grant (ESG), Supportive Housing, Shelter Plus Care, or Section 8 SRO Program funds must develop and implement a Discharge Coordination Policy, to the maximum extent practicable. Such a policy should include "policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons." The jurisdiction should describe its planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how the community will move toward such a policy.

3-5 Year Homeless Strategic Plan response:

1. HOMELESSNESS STRATEGY

The City of Lowell's Division of Planning and Development (DPD) is the lead entity and the applicant for the Continuum of Care (CoC). There is a staff position dedicated to organizing the CoC planning and subcommittee meetings, grant submittals, and program initiatives. Additionally development and finance specialists from DPD assigned to the CoC program include: Deputy Director of Planning and Development, Community Development Specialist, Senior Finance

Officer, Account Office Manager, Housing Program Manager, Construction Manager, and the Director of the Lead Hazard Control Program.

In January of 2007, the City of Lowell joined hundreds of cities across the nation in announcing that it would begin the process of creating a *10-Year Plan to End Homelessness* (10YP), as we now know it, in our community. Over 250 people attended the kick-off event held at the University of Massachusetts Lowell and over 100 people volunteered to serve on the City Manager's 10-Year Plan Committee. They represent all segments of the Greater Lowell community, from business and industry, to government and education, human service, medical and mental health institutions, banking, faith-based and community-based organizations, students and stakeholders.

On March 14, 2007, City Manager Bernard F. Lynch announced the creation of an Executive Committee as the primary decision making group for the 10YP. Since that time the EC, chaired by the city manager, has evolved into a senior-level management committee empowered to make and implement major organizational decisions; and it has the authority to request justification of Continuum of Care (CoC) and 10YP actions and plan activities. One of the EC's major goals is to integrate and align the city's 10YP with: all Federal, state and regional plans and programs to end homelessness; existing and/or developing local programs; and Homeless Management Information Systems. The EC is also responsible for addressing HUD's five major objectives (outlined below) to end chronic homelessness and move families and individuals to permanent housing; to monitor and evaluate program performance; identify gaps and needs within the system and coordinate a plan to address them; and celebrate/replicate existing and new innovative programs and best practices that can get and keep people housed. The EC is accountable to consumers, funders and residents of Lowell.

The City's 10-Year Plan Development Phases:

- ❑ **Phase I Partnership for Change: Action Plan to End Homelessness:** This Action Plan, completed in June of 2008, contains recommendations in 8 categories including: Families, Housing, Individuals & Street Dwellers, Jobs & Education, Prevention, Seniors, Systems Analysis/Administration & Oversight, and Youth. To complete Phase 1, 10YP Subcommittees composed of comprehensive teams and/or specific individuals with the expertise to research and evaluate "Best Practices" in the field, study existing conditions within the City and explore cost effective options for ending homelessness were created.
- ❑ **Phase II Partnership for Change: Implementation Plan to End Homelessness:** Following the release of the Action Plan, Phase II began to develop an Implementation Plan (IP). Currently in progress, the IP will outline goals that will allow 10YP partners, stakeholders and the Greater Lowell community to track progress in real time and ensure that public resources are spent on comprehensive and cost effective programs. The IP, estimated to be completed in the Spring of 2011 will include outcomes, critical partners, responsible persons, timelines and completion dates for reducing street and shelter populations.

2. CHRONIC HOMELESSNESS

The city of Lowell's 10 Year Plan (10YP) to End Homelessness is in its third year. The city's Division of Planning and Development (DPD) is the Lead Entity for the 10YP and is also responsible for the CoC, Community Development Block Grant, HOME Investment Partnership Program, Emergency Shelter Grants Program, Housing Opportunity for Persons with AIDS, Neighborhood Stabilization Program, and American Recovery and Reinvestment Act of 2009 Programs. DPD is also tasked with the responsibility of ensuring the comprehensive coordination and/or management of state homeless housing and services programs, the Merrimack Valley Regional Network, and any other mainstream and/or private funding that the city or its partners may receive to end homelessness. The 10YP Systems Analysis and CoC Work Group actively participate in efforts to coordinate the ConPlan, CoC, 10YP and any other strategy or plan to address prevention of homelessness, homelessness and chronic homelessness.

The 10YP Phase I Action Plan was completed in June of 2008 and since that time the city has embarked on the development of an ambitious, actionable Implementation Plan. The availability of new stimulus funding provided by the American Recovery and Reinvestment Act of 2009's, Homeless Prevention and Rapid Rehousing Program (HPRP) and the Commonwealth of Massachusetts' regional network initiative has stimulated the creation of new comprehensive regional strategies and funding to end and prevent homelessness. The table below summarized many of the strategies in progress and the action steps that will be taken to implement them.

Objectives to End Chronic Homelessness, Move Families and Individuals to Permanent Housing	Action Steps	Lead Person and Organization(s)	Current Level	1 Year Goals	5 Year Goals	10 Year Goals
Objective 1: Create new permanent housing beds for chronically homeless Individuals	Facilitate the use of MVRN flexible rental assistance funds to move 40 chronically homeless individuals from shelter to housing	Kristin Ross-Sitcawich - Merrimack Valley Regional Network; 10 YP Executive Committee	24	12	60	100
	Obtain Shelter Plus Care Funding to develop Janet House 12-unit permanent supportive housing for chronically homeless individuals.	Peter Duda - Lowell Transitional Living Center; 10 YP Executive Committee				
Objective 2: Increase percentage of homeless persons staying in permanent housing over 6 months to at least 77%.		Linda King - City of Lowell, DPD				
	Continue to monitor the success of the agencies providing permanent housing; and identify and assist programs falling below the HUD Standard of 77%.	City of Lowell - 10YP Project Manager	84%	85%	85%	90%
	Facilitate the use of Massachusetts Housing and Shelter Alliance – HPRP funds to hire 1 housing stabilization specialist	Walter Jabzanka - MHSA; 10 YP Executive Committee				

	Initiate reporting requirement for TH programs to track persons moving from TH to PH. Evaluate data and meet with both high and low performing programs to increase PH placements	Linda King - City of Lowell, DPD City of Lowell; and 10YP Systems Analysis Subcommittee				
Objective 3: Increase percentage of homeless persons moving from transitional housing to permanent housing to at least 65%.	Facilitate and continue the use of MVRN, HPRP and other subsidy programs to increase access to PH.	Kristin Ross-Sitcawich - Merrimack Valley Regional Network; 10 YP Executive Committee	62	70	80	95
	Expand the inventory of available rental units available to persons exiting TH by creating Memoranda of Understanding with Greater Lowell area Landlords	Leo Forcier - Greater Lowell Landlord Association; 10 YP Subcommittee Linda King- City of Lowell, DPD				
	Advocate for more housing units, more Section 7 vouchers with legislation	Karen Frederick - Community Teamwork, Inc.; 10YP Executive Committee				
Objective 4: Increase percentage of persons employed at program exit to at least 20 %.	Initiate reporting requirement for programs to track persons employed at exit. Evaluate data and meet with both high and low performing programs to increase job placement performance.	Linda King - City of Lowell, DPD; 10 YP Systems Analysis Subcommittee	15%	20%	30%	50%

	Engage/partner with non-profit, public/private employment programs and chambers of commerce to adopt comprehensive job programs and ensure access to jobs and Work Opportunity Tax Credits	Marianne Pelletier - Massachusetts Community College Executive Office; and 10YP Education & Employment Subcommittee				
	Explore and eliminate where possible barriers to employment such as transportation and childcare	Linda King - City of Lowell, DPD; 10 YP Systems Analysis Subcommittee				
	Explore the implementation of a city ordinance that establishes a contracting preference for X% for transitional employment and related services for homeless persons	Linda King - City of Lowell, DPD; 10 YP Systems Analysis Subcommittee			tbd	
Objective 5: Decrease the number of homeless households with children.	Facilitate the use of MVRN flexible rental assistance funds and HPRP to move 120 families from shelter to housing	Kristin Ross-Sitcawich - Merrimack Valley Regional Network; 10 YP Executive Committee				
	Continue to coordinate with 10YP CoC Planning Group, family shelter and housing providers, local and regional housing organizations and the Greater Lowell Landlords Association to meet this objective.	Linda King - City of Lowell, DPD; 10 YP Systems Analysis Subcommittee	56	45	30	20

3. HOMELESSNESS PREVENTION

Lowell's approach to preventing homelessness requires community-wide commitment and collaboration and offers innovative and actionable solutions. We believe that this approach is a transformation from crisis management to actual prevention of homelessness. It is our goal to provide communication and education on homelessness prevention to the community at large. The table below summarizes many of the strategies in progress and the action steps that are or will be taken to implement them.

Homelessness Prevention Strategic Goals	10YP Action Steps in Progress	Lead Person and Organization (s)
1. Create flexible Case Resources in the area of rental assistance, fuel and utility assistance, 1 st , last and security deposits, food stamps and other housing related costs	Expand Funding for Community Teamwork, Inc.'s (CTI) Stabilized Housing for Individuals and Families in Transition (SHIFT) program	Karen Frederick, Executive Director Community Teamwork, Inc. and Brent Rourke, SHIFT Coordinator
	Engage Area churches and religious organizations	Brent Rourke, SHIFT Coordinator; 10YP Faith Based Organizations Subcommittee
	Coordinate RAFT, FEMA and SHIFT Programs	Karen Frederick, Executive Director Community Teamwork, Inc.; 10YP Executive Committee
	Design/implement and administrative system for the above that includes input from all partners.	
	Facilitate the use of MVRN flexible rental assistance and HPRP funds for homeless prevention.	Kristin Ross-Sitcawich, Merrimack Valley Regional Network; 10 YP Executive Committee
2. Better coordinate housing-related non-cash assistance such as relocation assistance, housing search, housing maintenance/repair and mortgage assistance.	Promote single point of Entry for housing issues	Karen Frederick, Executive Director Community Teamwork, Inc.; 10YP Executive Committee
	Create a 1-800 Hotline for tenants, landlords, homeowners, general public	
	Coordinate MVRN and HPRP non-cash regional assistance efforts	Kristin Ross-Sitcawich, Merrimack Valley Regional Network; 10 YP Executive Committee
3. Expand and coordinate supportive services including referrals for specialized services, domestic violence support/protection, follow-up services after placement, job search, job skills, job training and assistance/referrals for substance abuse and mental health issues.	Design and share a uniform single point of entry intake form	TBD
	Ensure that wrap-around services are in place along with the permanent housing	10YP CoC Work Group
	Expand substance abuse/mental Health treatments and services	Susan Dargon-Hart, Institute of Health Resources; 10YP Behavioral Health/Medical Intercept Subcommittee

4. Provide mediation services when appropriate in the following areas: landlord/tenant, housing search, family situations, and mortgage assistance	Facilitate the use of MVRN HPRP funded housing stabilization specialists	Kristin Ross-Sitcawich, Merrimack Valley Regional Network; 10 YP Executive Committee
	Develop tenant/landlord mediation language/process for housing issues prior to Eviction Notice to be included in Memoranda of Understanding with Greater Lowell area	Leo Forcier, Greater Lowell Landlord Association, 10 YP Landlords Subcommittee
	Expand foreclosure prevention services to include hotline and counseling service	Linda King, City of Lowell DPD City of Lowell Foreclosure Prevention Task Force

4. INSTITUTIONAL STRUCTURE

The City of Lowell Division of Planning and Development acts as the lead agency for the City of Lowell's homelessness strategies. Partners in this effort include:

AIDS Action Committee	Lowell Continuum of Care
Alternative House	Lowell Housing Authority
Bedford Veterans Affairs Office	Lowell Transitional Living Center, Inc.
Cambridge Cares About AIDS	Massachusetts Dept. of Transitional Assistance
Catholic Charities of the Merrimack Valley	Massachusetts Dept. of Mental Health
Chelmsford Housing Authority	Mental Health Assoc of Greater Lowell
City of Lowell DPD	Metropolitan Boston Housing Partnership
City of Lowell Health Department	Middlesex North Resource Center
City of Lowell Hunger/Homeless Commission	Pathfinder
Community Teamwork, Inc	SHIFT Coalition
Greater Lowell Interfaith Leadership Alliance	Southern Middlesex Opportunity Council
House of Hope Inc.	St. Julie Asian Center
Justice Resource Institute	Tri-City Community Action Program
Lowell Community Health Center	U.S. Dept. of Veterans Affairs

The 10-Year Plan Executive Committee (EC) is the primary decision making group for the city's ending homelessness strategy. Chaired by Lowell's City Manager and staffed by the city's DPD, it is a senior-level management oversight committee. Members include representatives from state and local government, educational institutions, medical, mental health and criminal justice institutions, non-profit shelter and services providers, for-profit and non-profit landlords and regional housing authorities, business and industry, faith- and community-based organizations, and stakeholders. The EC has the authority to request justification of CoC/10YP actions and activities; and is empowered to make and implement all strategic decisions. Through the EC's Systems Analysis Task Force, the leadership works to integrate and align all plans and programs to address homelessness and end chronic homelessness for families and individuals. It monitors, evaluates and

analyzes program performance, training and retraining needs, identifies gaps/needs within the system, and works to achieve U. S. Department of Housing and Urban Development data collection requirements. It celebrates and replicates existing and new innovative programs and best practices that get and keep people housed.

5. DISCHARGE COORDINATION POLICY

The Commonwealth continues to work to develop effective policies to prevent discharge from institutions and health care facilities that result in homelessness.

One of the ways in which the Commonwealth provides for appropriate discharge planning across programs is the inclusion of discharge specifications in contracts. The State's Operational Services Division, the agency responsible for overseeing the Massachusetts Purchase of Service system, has developed discharge planning specifications for certain requests for proposals (the method for state procurement of services including all human services). The language aims to ensure consistency in discharge planning among vendors and to establish an effective discharge planning policy and system statewide.

City of Lowell's Discharge Planning Policy is discussed in the table below:

Publicly Funded Institution(s) or System(s) of Care in CoC Geographic Area	None	Initial Discussion	Protocol in Development	Formal Protocol Finalized	Formal Protocol Implemented
Foster Care					X
Health Care					X
Mental Health					X
Corrections					X

Foster Care

The Standards for Independent Living Services issued by the Department of Social Services requires that a written "Notice of Intent to Discharge" be issued to all youths whose Individual Service Plan (ISP) includes a Permanency Planning Goal of Independent Living within 90 days of their transition to substitute care of a DSS case closing. Prior to discharge, social workers assess the youth's readiness for discharge with their substitute care providers and the Discharge plan must include, among other things, "appropriate and stable housing arrangements".

It is the responsibility and charge of the Department of Social Services to ensure that all youth with a discharge plan are discharged to appropriate and stable housing. The DSS Standards for Independent Living Services specifically state that "in no case may youth be placed in inappropriate housing." If appropriate housing is not available, the youth is not eligible for discharge from the State's system of care.

Appropriate housing is defined as all housing *except shelters*, hotels/motels, and dwellings that fail to meet government health and building code standards.

Youth are routinely discharged through reunification with their families or, for those youth whose age allows, to an appropriate housing option which on occasion may, when that youth has no other options and the State has engaged in a full search, be referred to a HUD McKinney-Vento funded housing program.

Health Care

The Executive Office of Health and Human Services (EOHHS) has established Discharge Planning Standards, which are part of every Request for Proposal. Monitoring is carried out through site visits, annual reports, review of the Bureau of Substance Abuse Services discharge and admission data, analysis of billing data, and Risk Management analysis. Programs that are funded by the Bureau of Substance Abuse Services (BSAS) are required to submit BSAS admission and discharge data on all clients, not just clients funded through BSAS dollars, as well as billing and invoice data on all clients.

Language from the Request for Proposals Template:

"Transition/Discharge: The Commonwealth has determined that the discharging of consumers into homeless shelters is not an appropriate discharge plan. It is the Commonwealth's goal, through the implementation of aggressive and comprehensive discharge planning efforts, to reduce the number of inmates/clients who go into shelters after having been in residential programs. Bidders in their response to this RFP will be required to provide a plan of action which will become a contract performance goal that will enable the Commonwealth to achieve this goal."

On occasion, DPH funded detoxification programs may transition a participant within the Continuum of Care system, meaning from a detox bed to a next step bed. Such as a more appropriate transitional facility or to permanent supported housing. Some of these programs do receive HUD McKinney-Vento funds. The distinction is that they are not being discharged but transitioned through the system to the next stop on the Continuum where they will stabilize in housing and recovery. In fact some of our more successful SHP funded permanent housing programs allow for participants who relapse to go back to a short-term detoxification program and once stabilized in their recovery they are able to return to their SHP funded permanent housing unit.

Mental Health:

Regulation 104 CMR 27.09

"All mental health facilities are required to arrange for the necessary post-discharge support and clinical services needed to facilitate a smooth reentry to the community. Such measures must be documented in the client's medical record. All mental health facilities are required to make every effort to avoid discharge to the streets or shelters. All facilities are required to take steps to identify and offer alternative options to patients and must document such measures, including all competent refusals of alternative options by a patient, in the medical record. In the case of such a discharge the mental health facility must arrange for or, in the case of a competent refusal, identify post-discharge support and clinical services. The facility shall keep a record of all discharges to a shelter or the street in the approved form and submit such information to the Department of Mental Health on a quarterly basis."

The Department of Mental Health routinely discharges clients to their state-funded system of group homes. If the group home system is unable to accommodate the client they may, on occasion when they have no other housing resources and the mental health facility has exhausted other options, be referred to a HUD McKinney-Vento funded housing program.

Corrections (*Refers to local jails and state or federal prisons*)

Regulation 103 DOC 493

"The Department of Corrections issued a new policy in 2002 regarding the release preparation of inmates in their facilities. The policy has been implemented under the Public Safety Transition Program. The program includes three components: Developing individualized risk reduction plans. This component includes applications for specialized housing if it is determined that there are recidivism risks associated with certain behaviors (Sex offender, drug or alcohol abuse, etc) Participation in transition workshops (minimum of five per year) initiated as the inmate approaches release which are designed to establish a comprehensive treatment plan. This stage includes the development of a specific transition plan which addresses critical post release issues such as housing, employment medical (substance abuse and mental health) and basic life skills. Implementation of the post release plan is monitored by the DOC Re-entry Unit. The Re-entry Unit, specifically the Transition Planning Coordinator, through monthly meetings coordinates their work with the Institution Parole Officer, the Department of Mental Health Forensic Transition Team, Mental Health Team Leader, Transition Unit staff, and others as needed. In those cases where it is determined that the inmate has a mental health need they are referred to the Mental Health Team for targeted discharge planning.

Post-release planning and supervision to promote continuity between reentry plans and supervision and community services accessed upon release. The transition plan includes a "Living Arrangements" section where inmates outline the specifics of their housing reentry plan. "

The Department of Corrections (DOC) has taken a proactive approach to discharge planning and has targeted resources towards specialized housing with services to prevent inmates from reentering the corrections system and/or becoming homeless again. DOC has formed unique partnerships with both the City of Lowell and the Hampden County Jail and House of Correction to assist local communities with the release of ex-offenders from the larger system back into their community. DOC does not routinely discharge inmates to HUD funded McKinney – Vento programs.

Emergency Shelter Grants (ESG)

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

3-5 Year Strategic Plan ESG response:

Not Applicable



COMMUNITY DEVELOPMENT

Community Development (91.215 (e))

*Please also refer to the Community Development Table in the Needs.xls workbook

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), – i.e., public facilities, public improvements, public services and economic development.
2. Describe the basis for assigning the priority given to each category of priority needs.
3. Identify any obstacles to meeting underserved needs.
4. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

NOTE: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

3-5 Year Strategic Plan Community Development response:

1. PRIORITY COMMUNITY DEVELOPMENT NEEDS

Consistent with the City of Lowell's Master Plan, the city's core community development needs are those activities which help to cultivate economic opportunities through participation in the creative economy, improve the quality of life in the neighborhoods, and promote the Lowell as a Lifetime City. With these conceptual goals in mind, the City of Lowell anticipates using Community Development Block Grant (CDBG) funding to support programs to:

1. Help ensure that Lowell can be a "Lifetime City," particularly for those for whom the affordability of housing is a primary impediment. CDBG and other funds will be used to support the production, rehabilitation, and deleading of housing as well as public services aimed at youth, the elderly, and other underserved classes, to supplement basic housing in creating a stable and desirable community for people of all ages particularly at the low-income and moderate-income levels. Priority will also be placed on developing and supporting facilities for seniors and youth that provide social and other benefits to these age cohorts.
2. Provide training, education, and employment opportunities to help expand Lowell's workforce, particularly by lifting low-income and moderate-income

residents into stronger positions in the evolving economy. Particular emphasis will be placed on programs that cultivate entrepreneurship and microenterprise as well as those that create opportunities for larger-scale job creation through site assembly, environmental remediation, historic preservation, building rehabilitation, infrastructure development, technical assistance, and assistance to businesses.

3. Strengthen, preserve, and enhance the physical character of and quality of life in Lowell's neighborhoods, including the housing stock, and the public infrastructure and facilities, with particular emphasis on the low-income and moderate-income neighborhoods, designated urban renewal areas, and those areas that benefit all residents of this primarily low-income and moderate-income City. Priorities will be placed on projects that improve streets and transportation infrastructure, install sidewalks and provide for pedestrian safety, redevelop parks, plant trees, and create new parking facilities in these neighborhoods. In addition, code enforcement for existing residential buildings will be emphasized, so deteriorating properties do not have a detrimental influence on the neighborhoods. Finally, homeownership programs will be supported to help improve community stability by increasing homeownership rates in Lowell.
4. Continue to build the capacity of residents to empower themselves to help strengthen their community, address problems, and develop pride in their City. Public service activities that strengthen neighborhood organizations, provide employment, skills, and homebuyer training, and offer leadership opportunities to youth will be emphasized.

Low-income Neighborhood Impact Initiative

Consistent with these priorities, the City of Lowell launched a Neighborhood Impact Initiative to target resources in block groups where more than 51% of residents are low- or moderate-income and where significant deterioration has led to limited private investment and declining property values. This comprehensive program will help stabilize and revitalize neighborhoods through the concentrated investment of staff and financial resources from all City departments. Activities will include improvements to neighborhood facilities, parks, and infrastructure through divisions of the Department of Public Works, enhanced inspections by officials from the Health and Building Departments, coordinated actions by public safety departments, and significant capital investment to enhance the appearance of the targeted area.

Similar to the goals of HUD-designated Neighborhood Revitalization Strategy Areas (NRSAs), the City will concentrate resources in a target areas, in the hopes of maximizing the value and impact of its actions and expenditures. Under the Neighborhood Impact Initiative, the City will direct resources to a different neighborhood each year, with a goal of addressing all of Lowell's low- and moderate-income neighborhoods over a 5-6 year period. Consistent with the recommendations of the Comprehensive Master Plan, particular focus will be paid to the commercial centers and public squares within CDBG-eligible neighborhoods, where impacts will be felt by the broadest possible cross-section of neighborhood residents.

The program will be seeded with CDBG funds, along with portions of other funding including Chapter 90 funds for streets and sidewalk improvements, housing

rehabilitation and lead paint abatement funding, economic development incentives, and grant-funded policing initiatives.

Section 108 Loan Activities

During the 2010-2015 Consolidated Plan period, the City intends to use Community Development Block Grant funds to pay principal and interest payments associated with an outstanding Section 108 Loan that was used to support the final phase of the Boott Mills redevelopment until the development can assume financial responsibility for these payments directly. The project will be a mixed use development that will create new jobs available to low and moderate income residents consistent with CDBG regulations as well as mixed income housing. This rehabilitation will complement the existing museum, housing, and offices uses in the previously redeveloped portions of this nationally significant historic mill complex.

The City may also consider seeking new Section 108 loans for economic development and housing initiatives during this Consolidated Plan period, but has not yet identified additional specific projects as of the publication of this report.

2. BASIS FOR ASSIGNING PRIORITIES

The priorities for individual Community Development needs identified in this plan are derived from the input obtained from numerous outreach efforts, surveys, and consultations used to identify community needs and establish this Consolidated Plan's priorities. Prioritization also takes into consideration feasibility of projects, impact of the costs of larger projects on other priorities, the anticipated funding levels for the CDBG program, and other sources of funding that may be available to address established needs.

Activities which are labeled as "High" priorities in the tables below and elsewhere in this plan are those which will receive Consolidated Plan funding, assuming level funding of the City's formula grants over the next five years. Activities which are identified as "Medium" priorities are those which will likely receive Consolidated Plan funding if the applicable formula grants to the City of Lowell are increased during the next five years and may also receive funds if particularly strong projects are identified. Activities that receive a "Low" priority will not receive Consolidated Plan funding over the next five years without an amendment to this Consolidated Plan.

A "Low" rating does not necessarily diminish the importance of these activities or indicate that there is no need for them in Lowell. Many activities that are assigned a "Low" priority for CDBG funding are nevertheless important needs for the community or high priorities for other sources of funding. Some activities receive "Low" ratings if the funds that are potentially available under the Consolidated Plan programs would be insufficient to have a meaningful impact on these needs or adequately funding them would result in minimal output or outcome accomplishments relative to the amount of funds expended at the expense of other priority programs. An example is Sewer system improvements, for which the City has identified over \$200 million worth of improvements that are needed to address a combined sewer overflow problem.

Activities for which a matrix code has been assigned but are not listed in the table below are either not applicable to Lowell or have not been identified as a priority need to be supported by Consolidated Plan funds over the next five years.

The following chart (consistent with HUD Table 2B) identifies the relative priority of community development activities identified for the July 2010 through June 2015 Consolidated Plan period. Planning, program administration, and HOPWA-specific activities have not been included in this chart.

ACTIVITY	IDIS MATRIX CODE	PRIORITY	FUND SOURCE
<u>A. LIFETIME CITY</u>			
Acquisition of Real Property	01	High	CDBG, City
Disposition of Real Property	02	High	City
Senior Centers	03A	Medium	CDBG, City, State
Youth Centers	03D	High	CDBG, Private
Child Care Centers	03M	Low	State, Private
Health Facilities	03P	Medium	CDBG, State, Private
Abused and Neglected Children Facilities	03Q	Low	State, Private
Operating Costs Homeless/AIDS Programs	03T	High	ESG, HOPWA, State, Private
Senior Services	05A	Medium	CDBG, City
Handicapped Services	05B	Medium	CDBG, State, Private
Fair Housing Activities	05J	Medium	CDBG
Screening Lead-Based Paint/Lead Hazards	05P	Medium	CDBG, other Federal
Rental Housing Subsidies	05Q	High	HOME, HOPWA, State, other Federal
Security Deposits	05T	Medium	CDBG, State, Private
Removal of Architectural Barriers	10	Medium	CDBG, City
Construction of Housing	12	High	HOME, Private
Direct Homeownership Assistance	13	High	HOME, City, Private
Rehab, Single-Unit Residential	14A	High	CDBG, HOME, Private
Rehab, Multi-Unit Residential	14B	High	CDBG, HOME, Private
Public Housing Modernization	14C	Low	State, other Federal
Rehab, Publicly-Owned Residential Buildings	14D	High	HOME
Energy Efficiency Improvements	14F	High	HOME, CDBG, other Federal
Rehabilitation Administration	14H	High	CDBG, HOME, City, Private
Lead-Based/Lead Hazard Test/Abatement	14I	High	CDBG, other Federal
HOPWA-Facility Based Housing Development	31J	Low	HOPWA, Other
HOPWA-Facility Based Housing Operations	31K	High	HOPWA, Other
HOPWA-Short-Term Rent, Mortgage, Utility Payments	31G	High	HOPWA, Other
HOPWA-Tenant Based Rental Assistance	31F	High	HOPWA, Other
<u>B. ECONOMIC DEVELOPMENT</u>			
Clearance and Demolition	04	High	CDBG, City
Clean-up of Contaminated Sites	04A	High	CDBG, Other Federal, City
Relocation	08	High	CDBG, State, City
Rehab Commercial/Industrial Buildings	14E	High	CDBG, City, Private
Acquisition – for Rehabilitation	14G	Medium	CDBG, City, State
Non-Residential Historic Preservation	16B	Medium	CDBG, Private
Commercial/Industrial Land Acquis./Dispos.	17A	High	CDBG, City
Commercial/Industrial Infrastructure Development	17B	Medium	CDBG, State, City
Com./Ind. Bldg Acquis., Construct., Rehab.	17C	High	CDBG, State, City
Direct Financial Assistance to For-Profits	18A	High	CDBG, State, Private
ED Technical Assistance	18B	High	CDBG, State, City,

			Private
Micro-enterprise Assistance	18C	High	CDBG, Private
Assistance to Institutes of Higher Education	19D	Low	State, Private
Planned Repayment of Section 108 Loans	19F	High	CDBG, City
<u>C. NEIGHBORHOOD CHARACTER</u>			
Acquisition of Real Property	01	High	CDBG, City
Disposition of Real Property	02	High	CDBG, City
Neighborhood Facilities	03E	Low	City, Private
Parks, Recreational Facilities	03F	High	CDBG, City, State
Parking Facilities	03G	Low	City
Flood/Drain Improvements	03I	Low	City, State
Water/Sewer Improvements	03J	Low	State, Other Federal
Street Improvements	03K	High	CDBG, State
Sidewalks	03L	High	CDBG, State
Tree Planting	03N	High	CDBG, City, Private
Fire Stations/Equipment	03O	Low	City, State, Other Federal
Asbestos Removal	03R	Low	Private
Clearance and Demolition	04	High	CDBG, City
Crime Awareness	05I	Low	City, State, Other Federal
Code Enforcement	15	High	CDBG, City
Residential Historic Preservation	16A	Low	Private
Operation and Repair of Foreclosed Property	19E	Medium	CDBG, City
<u>D. CAPACITY BUILDING</u>			
Public Services (General)	05	High	CDBG, State, Private
Legal Services	05C	Low	Private
Youth Services	05D	High	CDBG, State, Private
Transportation Services	05E	Medium	CDBG, State, Other Federal
Substance Abuse Services	05F	Medium	CDBG, State, Private
Battered and Abused Spouses	05G	Medium	CDBG, State, Private
Employment Training	05H	High	CDBG, State, Private
Tenant/Landlord Counseling	05K	Medium	CDBG, Private
Child Care Services	05L	Low	Private
Health Services	05M	Low	Private
Abused and Neglected Children	05N	Low	State, Private
Mental Health Services	05O	Medium	CDBG, State, Private
Subsistence Payments	05Q	Medium	ESG, Private
Homeownership Assistance (not direct)	05R	High	CDBG, Private
Non-Profit Organization Capacity Building	19C	Medium	CDBG, Private
HOPWA-Supportive Services	31E	High	HOPWA, Other
HOPWA-Housing Information Services	31I	Medium	HOPWA, Other
HOPWA-Resource Identification	31H	Medium	HOPWA, Other

OBSTACLES TO MEETING UNDERSERVED NEEDS

The primary obstacle to meeting underserved needs in all four areas is funding. The lack of available funds that has been discussed elsewhere in this plan severely limits the levels of accomplishment that are possible and in many cases forces difficult choices between worthy needs, leaving some unmet.

The unstable housing market in Eastern Massachusetts limits the ability of the City of Lowell to achieve the desired "lifetime city" status where any person of any age and any income level can find quality, safe, and affordable housing and the amenities necessary to support their desired lifestyle.

Economic Development activities are often measured in terms of job creation. Meeting all of the employment needs in any community can be compromised by factors and trends in the global, national, and regional economies that are beyond the control of a local jurisdiction such as the City of Lowell. Taxation policies, labor standards, and regulatory programs of the state and federal government can all also pose obstacles to a city's meeting its job creation goals.

Many public service activities have been particularly hard hit by funding cuts at the federal and state government levels as well as from private foundations. When combined with regulatory mandates, even when well-intentioned, that restrict program activities, these can pose obstacles to the success of public service and capacity building activities. One example is restrictive definitions of "homelessness" that limit access to certain programs. Another is the requirement for criminal background checks for access to certain programs that cause agencies to deny service to individuals based on criminal histories as a means of dealing with severe funding limitations.

SPECIFIC LONG AND SHORT-TERM OBJECTIVES

For each of the activities identified above with a "high" priority, the following tables (consistent with HUD Table 2B) provide specific output accomplishment goals. Because funding for medium and low priority activities is not expected to be available, accomplishment goals are not provided. A discussion of anticipated outcomes for each conceptual goal follows. Where multiple activities will support the same projects, some have been removed from this table to eliminate potential redundancies.

All proposed and projected accomplishments are five-year goals based on the presumption of continued level funding of all programs at Federal Fiscal Year 2010 levels and are subject to the availability of funds. The totals listed do not necessarily reflect unique persons served since many activities will continue to serve ongoing needs of the same individuals for more than one program year. Accomplishments will necessarily change if funding is reduced or increased during the five year planning period.

A Lifetime City

ACTIVITY	ACCOMPLISHMENT UNITS	GOAL
Acquisition of Real Property	01-People (Area Benefit)	5000*
Disposition of Real Property	11-Public Facilities (Senior Center)	1
Youth Centers	01-People (Area Benefit)	5,000
Operating Costs Homeless/AIDS Programs	11-Public Facilities	1
Senior Services	01-People (Served)	3,000
Handicapped Services	01-People (Served)	15,000
Rental Housing Subsidies	01-People (Served)	1,000
Construction of Housing	04-Households	140
Direct Homeownership Assistance	10-Housing Units	100
Rehab, Single-Unit Residential	04-Households	175
Rehab, Multi-Unit Residential	10-Housing Units	75
Rehab, Publicly-Owned Residential Buildings	10-Housing Units	50
Energy Efficiency Improvements	10-Housing Units	10
Lead-Based/Lead Hazard Test/Abatement	10-Housing Units (Abated)	10
		50

* Number of seniors anticipated to be served annually at the Lowell Senior Center

Priority projects in this category include support for the Lowell Senior Center, including continued payment of the lease agreement for the facility, support for public service activities that benefit youth and senior populations, support for a new teen center as well as funding for other public facilities that benefit youth. Housing projects that contribute to the Replication Plan for the Julian Steele reinvention project as well as those located within the Acre Plan area are priorities, as are lead-paint abatement, energy efficiency improvements and housing rehab projects benefiting low-income and moderate-income households.

These activities will assist the City of Lowell in moving closer to becoming a true “lifetime city” where residents at all stages of life can find desirable, safe, and affordable housing along with the social and economic opportunities and lifestyle amenities that characterize a desirable place to live. CDBG and other Consolidated Plan funds will support efforts to make this “lifetime city” concept achievable for those at low-income and moderate-income levels.

Economic Development

ACTIVITY	ACCOMPLISHMENT UNITS	GOAL
Clearance and Demolition	08-Businesses (Buildings)	8
Clean-up of Contaminated Sites	10-Businesses (Created on Sites)	5
Relocation	08-Businesses	10
Rehab Commercial/Industrial Buildings	13-Jobs	50
Commercial/Industrial Land Acquis./Dispos.	13-Jobs	50
Com./Ind. Bldg Acquis., Construct., Rehab.	13-Jobs	50
Direct Financial Assistance to For-Profits	08-Businesses	200
ED Technical Assistance	08-Businesses	215
Micro-enterprise Assistance	01-People	150

The major economic development priority for the City of Lowell is the Jackson/Appleton/Middlesex (JAM) Urban Revitalization Plan, including the Hamilton Canal District redevelopment project. Other priorities include assistance to small businesses, microenterprises, and activities that help to diversify the City’s economy by building on creativity and entrepreneurship. Support for the Downtown Lowell arts and cultural district is also important to continue to strengthen the vitality of this area as a benefit to residents of the entire City.

Recognizing that Lowell’s economy is no longer grounded by large manufacturing employers, the City’s economic development strategy has changed to one of cultivating a climate that is favorable to diverse small businesses and entrepreneurship. These activities will encourage the development of a stronger entrepreneurial economy and a better educated and more creative workforce in Lowell. These factors will enable Lowell to develop a stronger, more diversified economy that better responds to contemporary circumstances and changes in the marketplace. Success in this area will equal more employment opportunities for Lowell’s low-income and moderate-income residents.

Neighborhood Character

ACTIVITY	ACCOMPLISHMENT UNITS	GOAL
Acquisition of Real Property	01-People (Area Benefit)	5,000
Disposition of Real Property	01-People (Area Benefit)	5,000
Parks, Recreational Facilities	11-Public Facilities (Parks)	5
	01-People (Area Benefit)	25,000
Street Improvements	11-Public Facilities (Linear Feet)	75,000
Sidewalks	01-People (Area Benefit)	35,000
Tree Planting	11-Public Facilities (Trees/Projects)	500/100
Clearance and Demolition	10-Housing Units (Demolished)	10
Code Enforcement	10-Housing Units (Inspected)	7,200

In addition to supporting both of the aforementioned urban revitalization plans (JAM and the Acre), project priorities in this category include those activities which promote and improve infrastructure and public facilities, as well as those which eliminate substandard and blighting influences through code enforcement and selective demolition.

Over the next 5 years, these activities will serve to enhance and promote the historic and cultural character of Lowell's neighborhoods and provide a high quality of life for current and future generations. By enhancing the appearance, pedestrian amenities, and distinctiveness of its neighborhoods, Lowell will foster a sense of solidarity and pride among residents, thereby strengthening community bonds, reducing behaviors such as crime and littering, and encouraging residents to become involved in protecting the character of their neighborhoods. Stronger neighborhoods will also result in higher and more stable property values, fewer abandoned and derelict buildings, and a reduction in property tax delinquency.

Capacity Building

ACTIVITY	ACCOMPLISHMENT UNITS	GOAL
Public Services (General)	01-People (Served)	60,000
Youth Services	01-People (Served)	3,500
Employment Training	01-People (Served)	765
Homeownership Assistance (not direct)	01-People (Served)	2000

The core intent of these activities is the empowerment of low-income and moderate-income residents. These activities provide residents with skills, stability, and core resources to help clients develop self-sufficiency and independence. Participants in these programs will be better able to complete education, obtain and retain employment, purchase or rent permanent housing, and meet basic needs improving their overall quality of life. Some activities are also aimed at improving the capacity and capabilities of neighborhood associations and other organizations. While these activities will measure their outcomes by the accomplishments of the clients served, their success may not be reflected in overall statistics for the community as new immigrants and others move in with similar needs. The totals listed do not necessarily reflect unique persons served since many activities will continue to serve ongoing needs of the same individuals for more than one program year.

Antipoverty Strategy (91.215 (h))

1. Describe the jurisdiction's goals, programs, and policies for reducing the number of poverty level families (as defined by the Office of Management and Budget and revised annually). In consultation with other appropriate public and private agencies, (i.e. TANF agency) state how the jurisdiction's goals, programs, and policies for producing and preserving affordable housing set forth in the housing component of the consolidated plan will be coordinated with other programs and services for which the jurisdiction is responsible.
2. Identify the extent to which this strategy will reduce (or assist in reducing) the number of poverty level families, taking into consideration factors over which the jurisdiction has control.

3-5 Year Strategic Plan Antipoverty Strategy response:

1. GOALS, PROGRAMS, AND POLICIES FOR REDUCING POVERTY

One goal of the Consolidated Plan programs and other initiatives in Lowell is to reduce the number of persons in poverty. The emphasis in Lowell is to help people rise out of poverty, rather than merely easing their situation temporarily. Although essential short-term direct aid such as emergency food and shelter is provided, the thrust of the City's policy is to address poverty's root causes and assist people in becoming self-sufficient in the long-term. Two key components of helping people attain self-sufficiency are employment and housing.

Examples of programs that *directly* influence people's ability to escape poverty include job education, micro-enterprise training and assistance, enrichment, development, and job placement services as well as housing advocacy, homelessness prevention, expiring use prevention and rental and homeownership assistance. Projects that *indirectly* affect poverty include those that upgrade the community, and provide transportation and child care services that help people access employment and services. CDBG, HOME, McKinney, HOPWA and ESG funds are often used as matching funds for other grants that also contribute to reducing the number of poverty level families. Thus, the power of these Federal dollars is leveraged to the fullest extent possible.

Recognizing that limited Consolidated Plan dollars should be focused where the need is greatest, Lowell gives preference to projects that directly benefit low and moderate income residents or serve low and moderate income neighborhoods over those that will benefit the City as a whole. This strategy will ensure that scarce resources are directed to best serve those who have the greatest need, including those areas with the greatest concentrations of poverty.

In addition to Consolidated Plan programs, a number of other public, private, and partnership initiatives have been designed to assist in the reduction of poverty rates. These programs include Family Self-Sufficiency, Head Start, Welfare to Work, the Workforce Investment Board, Lowell's Continuum of Care, McKinney grants, the Hunger Homeless Commission, and the SHIFT Coalition.

The SHIFT Coalition in particular is noteworthy as a partnership among non-profits, faith-based organizations, and the city and state governments, including the Department of Transitional Assistance, which is Massachusetts' Transitional Assistance to Needy Families (TANF) agency. The SHIFT coalition has been instrumental in identifying opportunities to creatively focus scarce resources to more effectively assist in reducing homelessness and poverty.

2. IMPACT ON POVERTY RATES

Unfortunately, these efforts, backed by extremely limited funds, are unlikely to have significant impact on the total number of poverty level families in Lowell. Factors beyond the control of the local jurisdiction, even with adequate funding, including the regional and national economies and the regional cost of living and housing will be far more influential than any actions a local government can take. Further, Lowell has historically been a more affordable community for housing and costs of living and is served by better public transportation and social service resources than nearly all of the other towns and cities in the Merrimack Valley. These factors may encourage new immigrants, many of whom live below the poverty level, to relocate to Lowell even as other families are able to rise out of poverty, limiting the measurable change in the City's poverty rates.

Nearly 17 percent of Lowellians are currently in poverty, according to the 2000 US Census. This compares to 13.5 percent in 1980 and 18 percent in 1990. Unfortunately, this statistic may not effectively measure the true extent of income-related need. One commonly cited weakness is that the US Census Bureau figures apply uniformly across the country, even though the cost of living ranges widely from region to region, and is particularly high in Eastern Massachusetts. A second weakness identified by the U.S. Office of Management and Budget (OMB) is that the US Census poverty statistics are based on assumptions about the cost of food and its percentage as a portion of the family budget. This cost also varies geographically. However, in an area such as Eastern Massachusetts where the difference in the cost of housing relative to other regions is significantly higher than the difference in the cost of food, it may further misrepresent the true impact of other costs of living.

The following table illustrates three measures of poverty which might be applied to Lowell: the US Census "official" measure, the OMB guidelines, and the Massachusetts Family Economic Self-Sufficiency Standard (FESS), developed by the Boston-based Women's Educational and Industrial Union (WEIU) and Wider Opportunities for Women. In a report entitled, *Treading Water in Quicksand: A Look at Poverty, Income Inadequacy and Self-Sufficiency in Massachusetts*, the FESS is defined as the amount of income necessary for a family to meet basic needs (including paying taxes) without public or private subsidies in each county in Massachusetts. The numbers cited below apply to Middlesex County.

Measures of Poverty Status

Size of Family Unit	US Census Poverty Levels	OMB Poverty Guidelines*	Family Economic Self-Sufficiency Standard†
1	\$8,667	\$9,310	\$19,444
2	\$10,869	\$12,490	\$26,742-39,389
3	\$13,290	\$15,610	\$34,626-51,002
4	\$17,029	\$18,850	\$41,954-54,989
5	\$20,127	\$22,030	\$59,390-65,914
6	\$22,727	\$25,210	\$69,952-74,542
7	\$25,912	\$28,390	\$77,036-83,687
8	N/A	\$31,570	\$86,797

* add \$3,980 for each additional person in the family

†In the report, family types are identified by age and status of household members as well as the number in the households.

Sources: 2000 US Census Bureau, Office of Management& Budget, Women's Educational and Industrial Union

Ultimately, with a median household income of \$39,192 in 2000, many Lowell families struggle to attain self-sufficiency. Nearly all Consolidated Plan funds are spent to benefit people who are clearly falling below the self-sufficiency standard. However, with limited funds, it is difficult to make significant measurable progress toward reducing poverty rates in Lowell by any standard.

Low Income Housing Tax Credit (LIHTC) Coordination (91.315 (k))

1. (States only) Describe the strategy to coordinate the Low-income Housing Tax Credit (LIHTC) with the development of housing that is affordable to low- and moderate-income families.

3-5 Year Strategic Plan LIHTC Coordination response:

Not Applicable



NON-HOMELESS SPECIAL NEEDS

Specific Special Needs Objectives (91.215)

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve over a specified time period.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

3-5 Year Non-homeless Special Needs Analysis response:

1. SPECIFIC SPECIAL NEEDS OBJECTIVES

Due to limited funding, the City of Lowell anticipates supporting only those activities identified as “high” priorities among non-homeless special needs. If additional funding is available or a particularly strong project is proposed, “medium” priorities may also be considered. The following table projects the non-homeless special needs populations that will be served with housing and supportive services activities during this five-year consolidated planning period. The totals listed do not necessarily reflect unique persons served since many activities will continue to serve ongoing needs of the same individuals for more than one program year.

SPECIAL NEEDS CATEGORY	HOUSING	SUPPORTIVE SERVICES
Elderly & Frail Elderly	N/A	15,000 people
Disabled (Develop. Or Physical)	N/A	150 people
Persons w/ HIV/AIDS	140 people	1,720 people

2. USE OF AVAILABLE RESOURCES

Many public service activities that have traditionally been funded through the CDBG program in Lowell serve the priority special needs populations identified above. The City of Lowell anticipates that these activities will continue to receive support. HOPWA funding will be used to assist with the supportive service needs of persons with HIV/AIDS in Lowell and throughout Middlesex County as is detailed below. Efforts will be made to ensure that supportive services are available in all areas of need within the county.

Additionally, the Commonwealth of Massachusetts through the Department of Mental Health, the Department of Public Health, the Division of Elder Services, and other agencies provides funding for a variety of housing and supportive services programs that serve many special needs populations in Lowell.

Non-homeless Special Needs (91.205 (d) and 91.210 (d)) Analysis (including HOPWA)

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Estimate, to the extent practicable, the number of persons in various subpopulations that are not homeless but may require housing or supportive services, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction, victims of domestic violence, and any other categories the jurisdiction may specify and describe their supportive housing needs. The jurisdiction can use the Non-Homeless Special Needs Table (formerly Table 1B) of their Consolidated Plan to help identify these needs.
*Note: HOPWA recipients must identify the size and characteristics of the population with HIV/AIDS and their families that will be served in the metropolitan area.
2. Identify the priority housing and supportive service needs of persons who are not homeless but may or may not require supportive housing, i.e., elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction by using the Non-homeless Special Needs Table.
3. Describe the basis for assigning the priority given to each category of priority needs.
4. Identify any obstacles to meeting underserved needs.
5. To the extent information is available, describe the facilities and services that assist persons who are not homeless but require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.
6. If the jurisdiction plans to use HOME or other tenant based rental assistance to assist one or more of these subpopulations, it must justify the need for such assistance in the plan.

3-5 Year Non-homeless Special Needs Analysis response:

1. NON-HOMELESS SPECIAL NEEDS POPULATIONS

The chart below (consistent with HUD Table 1B) outlines the estimated populations of persons in various identified categories who may have special needs for housing and supportive services in Lowell. The Non-Homeless Special Needs Table elsewhere in this document provides additional information.

CATEGORY	ESTIMATED PERSONS WITH HOUSING NEED	ESTIMATED PERSONS WITH SUPPORTIVE SERVICES NEED
Elderly	2381	3914
Frail Elderly	833	1400
Persons w/ Severe Mental Illness	100	1031
Disabled (Develop. Or Physical)	4604	7500
Alcohol/Other Drug Addicted	500	2842
Persons w/ HIV/AIDS	100	405
Total	8518	17,092

The elderly population was estimated using CHAS and Census 2000 poverty data. Frail elderly populations were estimated using CHAS, Census 2000, and MassCHIP (Community Health Information Program) data. Disabled populations were estimated using Census 2000 and CHAS data, as well as Lowell Housing Authority waiting lists. The population with substance addictions and the number of persons with HIV/AIDS were estimated using data collected by the Massachusetts Department of Public Health. Populations with mental illness were estimated using data collected by the Massachusetts Department of Mental Health.

3. PRIORITY NON-HOMELESS SPECIAL NEEDS

The chart below (consistent with HUD Table 1B) identifies the relative priority needs for various identified special needs categories for housing and supportive services in Lowell. For activities identified as "High" and "Medium" priorities, primary potential Consolidated Plan funding sources are noted.

SPECIAL NEEDS CATEGORY	HOUSING	SUPPORTIVE SERVICES
Elderly	MEDIUM (HOME)	MEDIUM (CDBG)
Frail Elderly	MEDIUM (HOME)	MEDIUM (CDBG)
Persons w/ Severe Mental Illness	LOW	MEDIUM (CDBG)
Disabled (Develop. Or Physical)	MEDIUM (HOME)	MEDIUM (CDBG)
Alcohol/Other Drug Addicted	LOW	MEDIUM (CDBG)
Persons w/ HIV/AIDS	LOW	HIGH (HOPWA)

Activities which are labeled as "High" priorities in the table below and elsewhere in this plan are those which will receive Consolidated Plan funding assuming level funding of the City's formula grants over the next five years. Activities which are identified as "Medium" priorities are those which will likely receive Consolidated Plan funding if the applicable formula grants to the City of Lowell are increased during the next five years and may also receive funds if particularly strong projects are identified. Activities that receive a "Low" priority will not receive Consolidated Plan funding over the next five years without an amendment to this Consolidated Plan.

4. BASIS FOR ASSIGNING PRIORITIES

The priorities for individual Non-Homeless Special Needs categories identified in this plan are derived from the input obtained from numerous outreach efforts, surveys, and consultations used to identify community needs and establish this Consolidated Plan's priorities. Prioritization also takes into consideration feasibility of projects, impact of the costs of larger projects on other priorities, the anticipated funding levels for the Consolidated Plan programs, and other sources of funding that may be available to address established needs.

A “Low” rating does not necessarily diminish the importance of these activities or indicate that there is no need for them in Lowell. Many activities that are assigned a “Low” priority in this plan are nevertheless important needs for the community or high priorities for other sources of funding. Some activities receive “Low” ratings if the funds that are potentially available under the Consolidated Plan programs would be insufficient to have a meaningful impact on these needs or adequately funding them would result in minimal output or outcome accomplishments relative to the amount of funds expended at the expense of other priority programs. The “Low” designations for several special needs housing activities are based on the limited availability of funds. Others receive a “Low” rating if there is less capacity within the local institutional structure for this plan to adequately address those needs than is available through state agencies and other entities.

5. OBSTACLES TO MEETING UNDERSERVED NEEDS

The primary obstacle to meeting underserved needs among these populations is limited funding. The lack of available funds that has been discussed elsewhere in this plan severely limits the levels of accomplishment that are possible and in many cases forces difficult choices among worthy needs, leaving some unmet.

The extremely high cost of housing and construction in Eastern Massachusetts severely restricts the City of Lowell’s ability to produce new housing units for special needs populations with the limited funds that are available under the Consolidated Plan programs. A very small number of housing units which would have minimal impact on the identified gaps would rapidly exhaust all available funding for other activities.

6. EXISTING FACILITIES AND SERVICES

There are more than 2500 affordable housing units in Lowell for elderly residents. The Lowell Housing Authority maintains more than 500 units in public housing projects for non-elderly special needs populations. More than 130 Section 8 certificate holders in Lowell are members of special needs groups. In the Massachusetts Department of Mental Health maintains approximately 23 units in group homes in Lowell and there are at least 25 private group home units for special needs populations.

The following table (consistent with HUD Table 1B) outlines supportive services and programs that are available for Lowell residents with non-homeless special needs.

POPULATION	FACILITY/AGENCY	SERVICES
Elderly and Frail Elderly	Lowell Housing Authority	Subsidized Housing
	CTI	
	Private Market	Advocacy, case management, support services, mental health, substance abuse and medical services
	Merrimack Valley Elder Services	
Persons with Mental Illness	Lowell Council on Aging	Meal and Food Programs
	Community Family	Alzheimer’s Day Care
	Greater Lowell Mental Health Assoc.	Mental Health –Information, Referral and outpatient treatment
	Greater Lowell Mental Health Assoc.	Mental Health – Day treatment and community support services

	Lowell Community Health Center Saints Memorial Medical Ctr. Lowell Mental Heath Assoc. Catholic Charities	Teen Mental Health – Information, referral outpatient treatment
	CASCAP/SHARE Department of Mental Health	Supportive housing
Persons with Disabilities	Lowell Assoc. for the Blind	Education, Social, Advocacy, and other support services fro the blind
	Lifelinks, Inc.	Supportive services
	Assoc. for Retarded Citizens Dept. of Mental Retardation Retarded Adult Rehab. Center	Residential, day care, recreation, case management, family support for mentally retarded adults and youth
Alcohol/Drug Addicted	Lowell Comm. Health Center Lowell House, Inc.	Substance abuse - Drug/alcohol detox, outpatient services
Persons with HIV/AIDS	Lowell House, Inc. Lowell Comm. Health Center Justice Resource Institute Tri-CAP Southern Middlesex Opportunity Council	Supportive Services, Education, Advocacy
	Cambridge Cares About AIDS	Tenant-Based Rental Assistance
	Aids Action Committee	Emergency Assistance
	Lowell Comm. Health Center Lowell House, Inc.	Health Care/Proscription Drug Assistance
Veterans	Bedford Veteran's Hospital	Short term vocational assistance
	Veterans Administration VA Clinic Veterans Affairs Office	Case management, substance abuse, mental health counseling, medical and psychiatric services
All Special Needs Populations	Merrimack Valley Legal Services	Legal services
	Open Pantry Catholic Charities Merrimack Valley Food Bank Salvation Army Central Food Ministry	Meal and food programs

7. TENANT-BASED RENTAL ASSISTANCE

Lowell anticipates funding tenant-based rental assistance with HOPWA funds during this Consolidated Plan period. Cambridge Cares About AIDS and Justice Resource Institute maintains waiting lists of clients with HIV/AIDS in need of tenant-based rental assistance in the Lowell HOPWA service area. Other organizations also maintain similar waiting lists.

While Lowell may also support tenant-based rental assistance with HOME funds, the City prefers to prioritize HOME dollars toward the creation of new affordable units. In recent years, many of these new units have been targeted for special needs populations including the homeless, victims of domestic violence, and the elderly.

Housing Opportunities for People with AIDS (HOPWA)

*Please also refer to the HOPWA Table in the Needs.xls workbook.

1. The Plan includes a description of the activities to be undertaken with its HOPWA Program funds to address priority unmet housing needs for the eligible population. Activities will assist persons who are not homeless but require supportive housing, such as efforts to prevent low-income individuals and families from becoming homeless and may address the housing needs of persons who are homeless in order to help homeless persons make the transition to permanent housing and independent living. The plan would identify any obstacles to meeting underserved needs and summarize the priorities and specific objectives, describing how funds made available will be used to address identified needs.
2. The Plan must establish annual HOPWA output goals for the planned number of households to be assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. The plan can also describe the special features or needs being addressed, such as support for persons who are homeless or chronically homeless. These outputs are to be used in connection with an assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.
3. For housing facility projects being developed, a target date for the completion of each development activity must be included and information on the continued use of these units for the eligible population based on their stewardship requirements (e.g. within the ten-year use periods for projects involving acquisition, new construction or substantial rehabilitation).
4. The Plan includes an explanation of how the funds will be allocated including a description of the geographic area in which assistance will be directed and the rationale for these geographic allocations and priorities. Include the name of each project sponsor, the zip code for the primary area(s) of planned activities, amounts committed to that sponsor, and whether the sponsor is a faith-based and/or grassroots organization.
5. The Plan describes the role of the lead jurisdiction in the eligible metropolitan statistical area (EMSA), involving (a) consultation to develop a metropolitan-wide strategy for addressing the needs of persons with HIV/AIDS and their families living throughout the EMSA with the other jurisdictions within the EMSA; (b) the standards and procedures to be used to monitor HOPWA Program activities in order to ensure compliance by project sponsors of the requirements of the program.
6. The Plan includes the certifications relevant to the HOPWA Program.

3-5 Year Strategic Plan HOPWA response:

1. PRIORITY UNMET NEEDS

The HOPWA funds received from the Department of Housing and Urban Development (HUD) will be used by a number of organizations across Middlesex County to address the unmet housing needs for the eligible population. These activities include not only direct dollar assistance, but also the services critical to this special needs population.

The following table outlines the priority HOPWA needs for Middlesex County. Activities marked as "High" priorities will receive funding during the five-year Consolidated Plan period. Those marked as "Medium" priorities may receive funding if funding levels increase or particularly strong proposals are submitted. Activities marked as "Low" priorities will not be funded during the five-year plan period due to limited availability of funds.

Activity	Priority	Funding Source
Tenant-Based Rental Assistance	High	HOPWA, Other
Short-Term Rent, Mortgage and Utility Payments	High	HOPWA, Other
Facility-Based Programs	Medium	HOPWA, Other
Operating Costs for Facility-Based Programs	Low	Other
New Facilities Developed with Capital Funds	Low	Other
Supportive Services in Conjunction with Housing Activities	High	HOPWA, Other
Housing Information and Placement Services	High	HOPWA, Other
HOPWA Technical Assistance	Medium	HOPWA, Other

The following organizations will assist in the delivery of HOPWA-related services and activities for the Middlesex County HOPWA region.

AIDS Action Committee's (AAC) Rental Assistance Program serves 60 unduplicated clients living with HIV/AIDS in Middlesex County with emergency rental assistance and start-up costs. AAC works with over 60 providers and maintains a provider database. The population served includes HIV/AIDS clients who are homeless, in need of affordable housing, chronically homeless persons, ex-offenders, people with mental illness, those facing imminent eviction and those struggling with addiction.

Cambridge Cares About AIDS, Inc. (CCAA) provides tenant based rental assistance through its Housing Opportunities for the Chronically Homeless program as well as supportive services including case management through its Men's Open Door single room occupancy (SRO) Housing program at the YMCA.

Justice Resource Institute (JRI) Health provides services (supported referrals, hands-on housing search, case management, ongoing needs assessments, etc.) to individuals and households utilizing Section 8 and HOPWA certificates. JRI also coordinates Tenant Based Rental Assistance services through its statewide initiative to the disabled, homeless or those at great risk of homelessness, who are living with HIV disease. Lowell HOPWA funds will support these targeted services to households in the Greater Lowell area.

Lowell House, Inc. (LHI) has provided services in the Greater Lowell community for over 35 years. The agency operates two residential recovery programs, housing 48 men and women. It provides HIV support case management services as well as housing information services to its HIV/AIDS clients.

South Middlesex Opportunity Council (SMOC) offers the Housing Re-Entry Program for inmates at risk of becoming homeless, sober housing, Housing Assistance Program (HAP) and Housing Consumer Education Center (HCEC) which

included housing information, search and advocacy. Its Counseling Program serves about 50 households (30% families, 70% individuals) for clients living with HIV/AIDS.

Tri-City Community Action Program, Inc. is continuing its current program of supportive services and case management as well as tenant based rental vouchers for chronically homeless individuals with HIV/AIDS. The program serves about 50 clients annually.

Victory Programs, Inc. oversees the Ruah House Project which provides permanent housing for seven homeless women living with HIV/AIDS and offers 24 hour staff coverage for those with compromised Activities of Daily Living by ensuring access to medical, mental health and social service agencies.

The City recognizes that other agencies throughout Middlesex County provide service and resources to households with HIV/AIDS. These programs often work in collaboration with the programs described earlier. During the 2010-2015 Consolidated Plan period the City hopes to create more opportunities for these organizations to partner and share resources.

The special needs of those persons with HIV/AIDS who have some type of housing include access to medical care, assistance with prescription drug costs, job training, counseling for those with mental health issues including depression, as well as fair wage employment, furniture banks, food pantries and food vouchers and legal assistance.

The special needs of HIV/AIDS persons without housing include all of the above, but multiplied by at least a factor of two. Obstacles to meeting underserved needs include: CORI checks that are not "cleanable," a lack of Section 8 vouchers, mental health issues and continued substance abuse. Emergency shelters are not a viable option for persons living with compromised immune systems who need to follow medical treatment because: (1) medications cannot be stored or are easily lost; (2) strict schedules for taking medications can't be followed, and (3) exposure is very high to infections and sickness. Leading research has found that the most critical issue for someone with HIV/AIDS is that they be permanently housed. People with HIV/AIDS are far more likely to have improved health if they have a place to live. All of the organizations listed above provide supportive services and/or direct assistance for housing costs. They serve approximately 400 HIV/AIDS clients with these special needs on an annual basis.

The HOPWA funding granted to Middlesex County will help alleviate some of the conditions as described above. In an effort to help provide some consistency to project sponsors in designing their programs and planning project budgets, the City changed its Request for Proposal process for the 2010-2011 program year that allowed applicants to submit proposals for the use of HOPWA funds over a five-year term beginning July 1, 2010. This change also allows the City to help predict the level of accomplishments that may be achieved over the five-year Consolidated Plan period and helps to reduce the paperwork associated with annual applications and grant agreements. The City will draft grant agreements with selected project sponsors, eligible for renewal each year over the course of the next five years, subject to availability of funds and compliance with reporting requirements. Annual HOPWA appropriation to a selected activity will be adjusted to correspond with the City's annual allocation from HUD. For example, if the City's HOPWA entitlement

decreases by 2% in year three of a five-year award, the activity award will likewise decrease by 2%. All seven agencies discussed above have been awarded five-year awards under this new process.

In order to provide room for flexibility and encourage new, innovative projects, the City will hold some funds aside each year to award to a new program that may not have historically received Lowell HOPWA funds. These funds may be awarded annually. Applications for these innovation funds will be reviewed on a rolling basis, as funding is available.

Special needs being addressed include referrals for medical care, assistance with prescription drug needs, transportation, classes for learning life skills, and mental health counseling. These services are provided in part to prevent homelessness as described above.

The combination of these housing services and the special needs supportive services described in this plan is designed to make progress toward the desired outcome of increased housing stability for those persons with HIV/AIDS in Middlesex County who receive services. Unfortunately, limited access to Section 8 certificates, reduced funding for social services by the Federal and state governments and the private sector, and increasing life expectancy for persons living with HIV/AIDS adversely impact progress toward the true outcome goal of increased housing stability for all persons with HIV/AIDS in Middlesex County.

HOPWA 5 Year Goals

Objective	Output	5-Year Goal
Improve ability of LMI households with HIV/AIDS to remain in decent affordable housing units	Number of households receiving housing related supportive services	1,720
Identify and afford decent housing for LMI households with HIV/AIDS with financial assistance and services	Number of homeless or at-risk households assisted in securing decent affordable housing	140

2. HOUSING FACILITY PROJECTS

Due to the limited funding available, the size of the service area, and the extremely high costs of property acquisition and development in Eastern Massachusetts, the City of Lowell does not anticipate using HOPWA funds for projects to construct new permanent housing for persons with HIV/AIDS during the Consolidated Plan period. One project to create 6-10 units where the need is greatest might easily absorb all available HOPWA funds for the five-year period.

3. GEOGRAPHIC ALLOCATION

The City of Lowell is responsible for administering the HOPWA grant for all of Middlesex County. As a result, efforts will be made to ensure that supportive services are available in each of the areas of concentration of persons with HIV/AIDS in the County (Cambridge/Somerville, Lowell, Framingham, and Malden/Medford).

Priority will also be given to supporting programs which service all or large portions of the County.

The following table identifies the primary HOPWA service providers in Middlesex County by service area and zip code. Merrimack Valley Catholic Charities is a faith-based organization.

Agency	Middlesex County Service Area	Zip Codes in Service Area
AIDS Action Committee	County-wide	01851, 01852, 01854, 01801, 02155, 02149, 02143, 02144, 02145
Cambridge Cares About AIDS	Cambridge area ³	02138, 02139, 02140, 02163, 02141, 02142, 02238, 02239
Justice Resource Institute	County-wide	01721, 01704, 01701, 01702, 01705, 01705, 01703, 01746, 01748, 01749, 01752, 01754, 01760, 01770, 01775, 01776, 02451, 02453, 02452, 02454, 02455, 01778, 02493
Lowell House	Greater Lowell ⁴	01850, 01851, 01852, 01853, 01854
Merrimack Valley Catholic Charities	Greater Lowell ⁴	01850, 01851, 01852, 01853, 01854
Southern Middlesex Opportunity Council	Metrowest ²	02474, 02475, 02476, 02138, 02139, 02140, 02163, 02141, 02142, 02238, 02239, 02149, 02144, 02143, 02145, 02472, 02471, 02477
Tri-City Community Action Programs	Malden/Medford/Everett	02148, 02155, 02156, 02153, 02149

1. Including Arlington, Bedford, Belmont, Burlington, Cambridge, Lexington, Malden, Medford, Melrose, North Reading, Reading, Stoneham, Wakefield, Watertown, Wilmington, Winchester, and Woburn.
2. Including Ashland, Framingham, Holliston, Hopkinton, Hudson, Marlborough, Maynard, Natick, Sherborn, Stow, Sudbury, Waltham, Wayland, Weston.
3. Including Arlington, Cambridge, Everett, Malden, Medford, Somerville, and Watertown.
4. Including Billerica, Chelmsford, Dracut, Lowell, Tewksbury, Tyngsboro, and Wilmington.

The only portion of the County that is not well served by these organizations is far northwestern Middlesex County, which has a much lower population density and a far lower incidence of HIV/AIDS diagnoses.

4. ROLE OF LEAD JURISDICTION

CONSULTATIONS

The City of Lowell worked with AIDS Housing Corporation, under a HOPWA technical assistance grant, in 2005 to conduct extensive research and outreach to document the nature and extent of HIV/AIDS cases in Middlesex County and develop a County-wide strategy for defining and addressing the most important needs within the county. The process of developing this plan included direct consultations with all existing service providers and two focus groups with service providers and clients that were discussed earlier in this document. In 2007, AHC completed an updated Needs Assessment. The results of this needs assessment, coupled with a survey of HOPWA service providers conducted as part of the planning of this Consolidated Plan

document have helped guide the priorities and goals of Lowell's HOPWA program. Finally, through the SHIFT Coalition, Lowell's Continuum of Care, and the State Interagency Council, Lowell remains involved in ongoing efforts to collaboratively address housing and homelessness-prevention issues on city, county, and state-wide levels.

MONITORING

The City of Lowell will implement a HOPWA subrecipient monitoring program consistent with the monitoring policy outlined earlier in this document. HOPWA subrecipients' compliance with applicable program regulations and requirements will be reviewed and documented through site visits, telephone interviews, written progress reports, and careful reviews of invoices submitted.

5. CERTIFICATIONS

The required program certifications are included in the Certifications section of the Annual Action Plan.

Specific HOPWA Objectives

1. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

3-5 Year Specific HOPWA Objectives response:

Currently, over \$1.5 million is spent on housing related services in Middlesex County for persons living with HIV/AIDS. If HOPWA, Massachusetts Department of Public Health's AIDS Bureau, CARE Act (Title 1), and Ryan White CARE Act funding remains reasonably level, Lowell will continue to address the identified needs for the years covered by this Five-Year Consolidated Plan. Funding, however, does not allow for any new development with HOPWA funds. It will permit the City of Lowell to continue to provide housing and supportive services to HIV/AIDS clients over the five year consolidated plan period and will include assisting with housing information and advocacy services through Tri CAP in Malden, SMOC in Framingham, CCAA in Cambridge, JRI in Boston and the Lowell House in Lowell. In addition, funds will be spent on emergency rental assistance to prevent homelessness, and rental start-up funds to help pay for first and last month's rent as well as security deposits primarily through the AIDS Action Committee's Rental Assistance Program. Being suitably housed is critical for positive health outcomes for persons with HIV/AIDS – and the greatest need for these persons is permanent, affordable housing. Key to getting and keeping people housed are the supportive services such as case management, supportive housing staff, housing advocacy, assistance with health services, both physical and mental, etc. The City of Lowell will continue to act in collaboration with other organizations across the county as well as with other funders in order to leverage dollars.

OTHER NARRATIVE

Include any Strategic Plan information that was not covered by a narrative in any other section.

Public Hearing Sign in Sheets:

December 10, 2009

April 1, 2010



FY 10-11 Annual Action Plan Public Hearing #1



December 10, 2009 – Sign In Sheet

Name/Organization

Phone/Email

Dotty Duval, Catholic Charities

978-452-1421,

MARCY Szczepanik

dotty-duval@ccldo.org

Open Pantry of Gr Lowell 4543573

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5-Year Consolidated Plan (2010-2015) FY 10-11 Annual Action Plan



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